THE NAVAJO NATION



RUSSELL BEGAYE PRESIDENT JONATHAN NEZ VICE-RESIDENT

ENVIRONMENTAL PROTECTION AGENCY

Waste Regulatory Compliance Department

P.O. Box 3089, Window Rock, Navajo Nation, AZ 86515 Tel: (928) 871-7793 Fax: (928) 871-7783

December 20, 2016

Noemic Emeric-Ford EPA Region 9 75 Hawthorne Street, SFD6-1 San Francisco, CA 94105 Phone: (213) 244-1821

RE: FY2017 Proposal for Brownfields Site-Specific Assessment Grant - Navajo Forest Products Industries Site, Navajo, McKinley County, New Mexico

Dear Noemi Emeric-Ford:

The Navajo Nation, through the Navajo Nation Environmental Protection Agency (NNEPA) Superfund Program (NSP), is pleased to submit the United States EPA (USEPA) Site-specific Assessment Grant Proposal for a Hazardous Substances and Petroleum contaminated site. The Navajo Forest Products Industries (NFPI) site is located at Navajo Route 12/Cleveland Boulevard/Shepard Springs Boulevard, Navajo, McKinley County, New Mexico, 87328 which is under the jurisdiction of the Navajo Nation where high poverty, high unemployment, abandoned gas stations, dilapidated houses and abandoned houses exist.

We are applying for Brownfields assessment funding to address both hazardous substances and petroleum contamination for a period of three years. The hazardous substances and petroleum-contaminated areas are distinguishable in the site. The site is of a relatively low risk and no viable responsible party exists for cleaning of the Site. The applicant is not potentially liable for cleaning up the site and the site is not subject to a RCRA corrective action order. The funding requested is \$350,000 which comprises of \$200,000 for Hazardous Substances and \$150,000 for Petroleum sites.

The NSP is a program under the Waste Regulatory Compliance Department of the NNEPA Division. The NSP partners with the Navajo Nation Red Lake Chapter#18 (NNRLC) community and the Navajo Nation Division of Economic Development (NNDED) with a mission to remediate and redevelop the NFPI site after contamination assessment and cleanup have been completed. The USEPA Brownfields Site-specific Assessment Grant funds will enable our partnership to conduct contamination assessment. The NFPI site will be redeveloped as a Biomass Recycling and Cogeneration Business Center. Support letters from the NNRLC and NNDED are included as attachments to the grant application. Following are the specific information requested in the FY17 Guidelines for Brownfields Grants:

- Applicant Identification: The NNEPA Superfund Program, Hwy 264/43 Crest Rd., Saint Michaels, AZ 86511
- b. DUNS Number : 142117261

- c. Funding Requested: i.) Grant Type: Assessment, ii) Federal Funds Requested for assessment activities: \$350,000, iii) Contamination: Hazardous Substances and Petroleum and iv) Site-specific.
- d. Location: The site is located at Navajo Route 12/Cleveland Boulevard/Shepard Springs Boulevard, Navajo, McKinley County, NM which is under the jurisdiction of the Navajo Nation

Russell Begaye

. Phone: (928) 871-7915

The Navajo Nation President

P.O. Box 7440, Window Rock, AZ 86515

- e. Property Name: Navajo Forest Products Industries
- f. Contacts:

Freida S. White Environmental Protection Supervisor Navajo Nation Environmental Protection Agency Superfund Program

Hwy 264/43 Crest Rd., Saint Michaels, AZ Fax: (928) 871-7005

86511

Phone: (928) 871-6859 Fax: (928) 871-7333

Email: freidawhite@navajo-nsn.gov

g. Date Submitted: December 20, 2016

h. Project Periods: Three Years

- General Population: According to the 2010 US Census, the total population for Navajo CDP is 1,645.
- Special Considerations: Checklist is attached to the transmittal letter.

It is our hope that the USEPA will respond to the need of the NFPI site's contamination and future prospects. We are anticipating a successful partnership with the USEPA towards completion of this project. Please call my office at (928) 871-7993 if there are any questions or need of additional information.

Sincerely,

Diane Malone, Manager

NNEPA-Waste Regulatory and Compliance Department

FY2017 Brownfields Assessment Grant Application

for

Former Navajo Forest Products Industries Site Navajo, McKinely County, New Mexico

December 20, 2016

Participants:

Arval T. McCable, Chapter President Red Lake Chapter P.O. Box 130 Navajo, NM 87328

Crystal J. Deschinny, Director Division of Economic Development Navajo Nation P.O. Box 663 Window Rock, AZ 86515

Prepared By:

Freida S. White, Program Supervisor Navajo Nation EPA Superfund Program Hwy 264/43 Crest Road Saint Michaels, AZ 86511

Table of Contents

I	EL	GIBILITY INFORMARTION and THRESHOLD CRITERIA	. 6
	1.1	Applicant	. 6
	1.2	Community Involvement	. 6
	1.3	Site Eligibility and Property Ownership Eligibility	. 6
	1.4	Brownfields Site Definition	. 8
	1.5	Enforcement or Other Actions	. 9
	1.6	Sites Requiring a Property-Specific Determination	. 9
	1.7	Site Eligibility and Property Ownership Eligibility	. 9
2	NA	RRATIVE PROPOSAL/RANKING CRITERIA	10
	2.1	Community Need	12
	2.2	Project Description and Feasibility of Success	16
	2.3	Community Engagement and Partnerships	20
	2.4	Project Benefits	21
	2.5	Programmatic Capability and Past Performance	22
A	ppendi	x A: Phase 1 Environmental Site Assessment x B: Support letter from the Navajo Nation Department of Economic Development x C: Support letter from the Red Lake Chapter#18 Community	
		List of Figures	
	_	. The NFPI site location map	
Fi	gure 2	. The NFPI building and wells locations	. 8
		List of Tables	
Ta	able 1.	Comparison of demographic information	12
Та 		Tentative timelines for hazardous substance and petroleum assessments of the NFPI sit	
Та	able 3.	Contaminants of concerns in different media and locations of the Site	19
Ta	able 4.	Budget distribution by task for Hazardous substances assessment	20
Ta	able 5.	Budget distribution by task for petroleum assessment	20
Ta	able 6.	Chart of partnership information	21

1 ELIGIBILITY INFORMARTION and THRESHOLD CRITERIA

1.1 Applicant

The Navajo Nation EPA Superfund Program (NSP) is within the Navajo Nation Environmental Protection Agency (NNEPA), a government agency in the Navajo Nation Tribal Government (NN). The Navajo Nation (NN) is a federally recognized Indian Tribe.

1.2 Community Involvement

The NSP is partnering with the Navajo Nation Division of Economic Development (NNDED) and Red Lake Chapter#18 (RLC), one of the 110 the NN Chapters, to encourage community involvement and input from residents living in the Navajo community throughout the duration and results of the assessment. With the receipt of assessment funding and before the project initiates, the NSP and RLC will inform the community about assessment activities and will provide updates and receive inputs.

1.3 Site Eligibility and Property Ownership Eligibility

1.3.1 Basic Site Information

Name: Navajo Forest Products Industries (NFPI)

Address: Navajo Route 12/Cleveland Boulevard/Shepard Springs Boulevard,

Navajo, McKinley County, New Mexico, 87328

Current Owner: The Navajo Nation

1.3.2 Status and History of Contamination at the Site

The NFPI site, herein referred as the Site, is contaminated by hazardous and petroleum substances. In 1958, the Navajo Nation approved a lease for the NFPI to manufacture lumber products which was eventually expanded to include a particleboard factory, millworks with machinery support and maintenance shops. From 1983 to 1991, Ponderosa Products, Inc. (PPI) operated an on-site particleboard plant that was leased from the NFPI. The PPI operations were ceased in 1995. The NFPI became a large hazardous wastes generator and utilized a nearby dumpsite as a disposal area for wastes generated from the sawmill and particle board activities during the thirty eight years period. The location map of the Site is shown in Figure 1. In 1998, the Navajo Nation approved a business lease for Millennial Homes, Inc. (MHI) to establish a residential housing and commercial building manufacturing operations in Storage Building #8 as shown in Figure 2. The MHI operations were ended in 1999. Other multiple businesses utilized the site for scrapping of metal materials from 1999 to 2009. Two fire incidents occurred in the Site since 1999: one in the Millworks buildings that contained documents and the other in the PPI building where subcontractors were using a torch in a petroleum contaminated area.

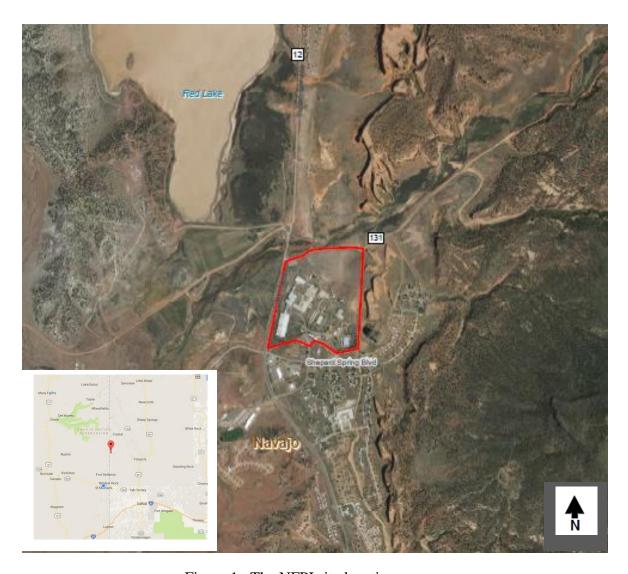


Figure 1. The NFPI site location map.

Since the Site has defaulted to the Navajo Nation, the Navajo Nation EPA has been the entity to respond to environmental problems at the Site to prevent and limit exposure of any released hazardous substances. In 1991, a joint site inspection was performed by the NNEPA and USEPA. As a result, eighty-eight abandoned 55-gallon drums of hazardous substances were sampled, characterized and manifested off-site by a contractor in 1993. The USEPA Emergency Response Team removed large transformers and capacitors from the Site in 1998. In 2000, Terranova Forest Products, Inc. (TFP) removed some asbestos containing materials.

The RLC, the Navajo Nation Property Management Department (NNPMD), Nations Oil & Gas, Inc. (NO&G), TFP, and the Navajo Townsite Community Development Corporation (NTCDC) are using four NFPI buildings since 2001. Portions of Building #1 are occupied by the RLC, NO&G, and TFP (Figure 2). The NO&G and NTCDC are using Storage Building #21 and Building #3, respectively (Figure 2.). Similarly, the Navajo PMD uses Guard House #2.

The NFPI's manufacturing facility has left a legacy of hazardous chemicals and petroleum contamination. The Site consists of a fenced area of 103.28 acres and a 45-acre dump

located approximately one-half mile northeast of the Site. Seventeen buildings out of thirty-one buildings remain on the site and majority of them are heavily fire damaged. The Site is situated in a rural area with nearby agricultural, business and residential areas. A nearby tributary receives flow from the NFPI dump and the NFPI site. There is the Red Lake that receives water from the tributary by pumping (shown in Figure 1).

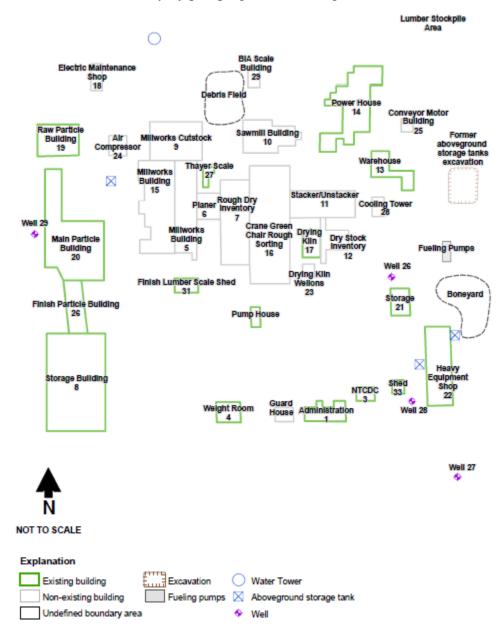


Figure 2. The NFPI buildings and wells locations.

1.4 Brownfields Site Definition

- The Site is not listed or proposed for the National Priorities List.
- The Site is not subject to unilateral administrative orders, court orders, and administrative orders on consent, judicial consent decrees issued to or entered into by parties under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

• The Site is not subject to jurisdiction, custody, or control of the U.S. government.

1.5 Enforcement or Other Actions

There are no enforcement actions on the Site.

1.6 Sites Requiring a Property-Specific Determination

The Site does not fall into the list of sites under Property-Specific Determinations definition of Appendix 1, Section 1.5. Therefore, Property-Specific Determination is not needed as the Site is not subject to planned or ongoing removal actions under CERCLA. Moreover, the Site has not been issued or entered into an unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under Resource Conservation and Recovery Act (RCRA), Federal Water Pollution Control Act, Toxic Substance Control Act and or Safe Drinking Water Act. In addition, the Site is not subject to RCRA corrective action; the Site is not a land disposal unit that has submitted a RCRA closure notification or that is subject to closure requirements specified in a closure plan or permit; the Site does not have known release of polychlorinated biphenyl (PCBs) as obtained during Environmental Site Assessments (ESA) (Appendix A) and the Site is not a facility receiving money for cleanup from Leaking Underground Storage Tank (LUST) trust funds.

1.7 Site Eligibility and Property Ownership Eligibility

1.7.1 Hazardous Substance Site

The Site was operated by the NFPI, a tribal enterprise, until 1995. The NFPI went out of business in 1995; therefore, it is not possible to seek a cost recovery or to enforce against the NFPI. The Navajo Nation itself is not liable under CERCLA because tribes are not defined as "persons" under CERCLA and only "persons" are liable under CERCLA '107'.

The applicant, the NSP, is a part of the Executive Branch under the Navajo Nation President and is under the Waste Regulatory Compliance Department (WRCD) of the NNEPA division of the Executive Branch. The Navajo Nation owns the property and is held in trust by the U.S. government. The owners' role, the Navajo Nation government, will be represented by the RLC and NNDED. The owners' major roles will be to assist with community input and outreach and most importantly, to develop final use plans and redevelopment plans for the Site. The owners will also be actively involved throughout phases of the Site assessment, cleanup and redevelopment.

The NSP does not own the site. Access to the site is gained by coordination with the RLC office. The RLC has its office within the former NFPI Administration Building (Figure 2). The RLC is very helpful to assist the NSP with entry to the site by our staff and contractors. An example of their assistance is when we coordinated a joint response for fire incidents at the NFPI dumpsite in 2010. The RLC provided an access to a locked secure area for heavy equipment at the Site. Access to neighboring properties would be needed when sampling occurs within an individual grazing unit. Access issues will be discussed with the community at large at scheduled RLC community meetings.

1.7.2 Petroleum Site

i) Current and Immediate Past Owners

The Navajo Nation owns the property and the land are held in trust by the U.S. government. The Site was left abandoned in 1995 and soon thereafter, defaulted to the Navajo Nation within the RLC. In 1958, the Navajo Nation approved a business lease for the NFPI, a tribal enterprise, to manufacture lumber products which were eventually expanded to include a particleboard factory, millworks with machinery support and maintenance shops. From 1983 to 1991, Ponderosa Products, Inc. (PPI) operated an on-site particleboard plant that was leased from NFPI. All operations ceased in 1995. After the Site was abandoned by the NFPI, the NN approved a business lease for Millennial Homes, Inc. (MMI) to establish a residential housing and commercial building manufacturing operation in Storage Building#8 which ceased operations in January 1999. From 1999 through 2009, there have been other municipal businesses utilizing the site for scrapping of metal materials. As of 2001, staff from the RLC, Navajo Nation Property Management Department (Navajo PMD), Nations Oil & Gas, Inc. (NO&G), Terranova Forest Products, Inc (TFP) and the Navajo Townsite Community Development Corporation (NTCDC) were utilizing four NFPI buildings.

ii) Acquisition of Site

The Site was left abandoned in 1995 when the NFPI went out of business and soon thereafter, defaulted to the Navajo Nation.

iii) No Responsible Party for the Site

The NNEPA has never dispensed of petroleum or their products at the Site. The Site was operated by the NFPI, a tribal enterprise, until 1995 and during that time the NFPI did dispense of petroleum or petroleum products at the Site. Four fuel pump dispensers were located on Site: two diesels, unleaded and regular pump dispensers still exist on the site. Leaks are observed on the soil. Product fuel lines are still in existence but have been cut and partially removed by an unknown source. The product lines ran northeast approximately 157 feet to an aboveground storage tank (AST) bermed area. Two steel ASTs existed in this same bermed area and one has since been removed by an unknown source. The other AST has been moved to another location, again by an unknown source. Evidence of heavy soil saturation with strong petroleum odors in and around the bermed area still exists on the Site.

iv) Assessed by a Person Not Potentially Liable

The NNEPA has taken reasonable steps with regard to the contamination at the Site and to mitigate potential threats that could result from the conditions found at the Site. The NNEPA Waste Regulatory and Compliance Department (WRCD) prepared a report titled "Field Recconnaissance for the Navajo Forest Products Industries, Navajo, New Mexico in 2004". In this report, the NNEPA documented existing conditions related to petroleum, petroleum products and any evidence of contamination from these materials. In August 2012, the NNEPA WRCD hosted a Scope of Work meeting and site visit to address immediate problems for the AST issues at the Site. In September 2012, the WRCD secured the removal of three ASTs from the Site. All free products found in the tanks were taken to a certified recycler and all three ASTs had evidence of leakages.

v) Relatively Low Risk

The NNEPA believes that the Site is eligible for Brownfields funding since the Site is of "Relatively Low Risk". The Navajo Nation is not able to compare this Site to other "State" sites in Arizona since the NNEPA does not work on sites outside the Navajo Nation. The Site has

never utilized any federal LUST trust fund. Moreover, the Site is not currently subject to a response under the Oil Pollution Act.

vi) Judgments, Orders or Third Party Suits

There have been no Judgments, Orders or Third Party Suits brought against the applicant or a Request for Proposal for the site.

vii) Subject to RCRA

The Site is not subject to RCRA.

viii) Financial Viability of Responsible Parties

There is no viable responsible party for this Site. The NNEPA and RLC do not have funds to cover assessment activities.

2 NARRATIVE PROPOSAL/RANKING CRITERIA

2.1 Community Need

2.1.1 Target Area and Brownfield

2.1.1.1 Community and Target Area Descriptions

Our targeted community is the town of Navajo, McKinley County, New Mexico. Houses are empty, dilapidated, and/or abandoned with the presence of an abandoned convenience store and gasoline station. Since the NFPI site closed in 1995, the community has experienced abandoned homes that had served as "company houses" that have since gone into disrepair and neglect. Now these homes serve as backdrops for local gang hangouts and graffiti drawing boards. The town used to be thriving with activities for children such as a swimming pool and activity center. These have also been long gone.

The NFPI was a major employer for the community of Navajo from 1958 to 1995. The NFPI employed local and commuter Navajos. The NFPI manufactured lumber products from 1958 to 1995 and expanded to include a particleboard factory, millworks with machinery support and maintenance shops in 1983. In 1992, the Navajo Nation ten years Forest Management Plan expired, causing the logging operations to cease until a new plan was developed. Meanwhile, the NFPI bought timber from off-reservation. The NFPI finally closed all their operations in 1995 because of costly operations. The cessation of the NFPI operations hindered the economy in the area because family sustaining jobs were lost. The unemployment rate in the community has reached 26.83% greater than the average Navajo Nation unemployment rate. Therefore, the site has been designated as a potential business site and the site now has become a Brownfields site.

2.1.1.2 Demographic Information and Indicators of Need

The Table 1 shows an overview of the Navajo community that contains the NFPI contaminated site with comparative information to the Navajo Nation as a whole, the State of New Mexico and the United States.

	Navajo, NM	Navajo	New Mexico	United
	Community	Nation	State	States
Population	1,645 ²	173,667 ¹	$2,059,179^3$	308,745,538 ²
			(2010)	(2010)
Median Household Income	$$22,904^2$	$$25,456^2$	$$43,820^{2}$	\$51,914
	(2009)	(2007)	(2010)	(2010)
Unemployment Rate	$77.35\%^4$	$50.52\%^4$	$6.4\%^{2}$	9.5%
	(2007)	(2007)	(2009)	(2010)
Individuals Below Poverty	$49.1\%^{2}$ (2007)	36.8% ⁴	18.1%	13.0% 4
Rate	62.9% (2009)	(2007)	(2007)	(2007)
Elderly Below Poverty	² 52%	$44.4\%^{4}$	13.3%4	9.5% 4
Rate (BPR)	(2008)	(2007)	(2007)	(2007)
	2	4	4	4
Single Mothers BPR	$68.6\%^2$ (2009)	47.6% ⁴	45.9% ⁴	36.5% ⁴

Table 1. Comparison of demographic information.

(child. Under 18)	Categorized as	(2007)	(2007)	(2007)
	Poor residents			
	with Children			
	helow 18			

¹2010 Census data; Completed data set on total population; not enrollment.

2.1.1.3 Brownfields and Their Impacts

The NFPI's manufacturing facility has left a legacy of hazardous chemicals and petroleum contamination. The NFPI site is located on 103.28 acres with seventeen, out of an original thirty-one buildings, and 45.00 acres dumpsite located approximately one-half mile northeast of the NFPI site. The entire site is situated in a rural area with nearby residential, agricultural, and business areas. The NFPI generated large hazardous wastes during their operations from 1958 through 1995 and utilized a nearby dumpsite as a disposal area. Multiple businesses utilized the site for scrapping of metal materials from 1999 through 2009. Two fire incidents occurred in the site: one in the Millworks buildings and the other in the PPI building since 1999.

2.1.2 Welfare, Environmental, and Public Health Impacts

The site contamination, dumped waste, surface runoff, groundwater impacts, air emissions, and general migration of contaminants can lead to environmental and health risk impacts. The wastes from the NFPI site can result in direct detrimental impacts to the residents. The closest residents to the site are approximately 500 feet from the NFPI dump site and housing developments are located about a half mile southeast of the site. During the summer of 2010, the NSP received calls from residents and the local Navajo Pine Fire Department complaining of the NFPI dump fire that had been burning for a year and longer. The fire has always burned in the dump and the dump site keeps getting worse every year. The NSP responded to the report and coordinated a response to smother the fire with dirt. The nearby residents told the NSP that they have asthma in their entire family and they are sure the cause is the smoke from the smoldering fire. The area of the dump is in a valley. So on calm days there exists an inversion layer of smoke. At the NFPI site itself, one of the potential contaminants of concern (PCOC) is asbestos. The buildings on the NFPI site were built in the 1950's and 1960's. Therefore, there could have suspension of asbestos into the air. Suspension of asbestos in the air is likely due to the age and conditions of the buildings. Soil contamination, surface and groundwater contamination is also of concerns. There are many unknown hazardous substances at this site. We just don't know what is in the soil or the water and at what concentrations. There is evidence of hazardous substances contamination at the sites (Appendix A). There is a Red Lake that has water pumped from the tributaries. The tributaries receive flow from the NFPI dumpsite and the NFPI site. The Navajo Nation Fundamental Law dictates that conditions support use of the land and water for eternity. The current environmental health of the NFPI site is an injustice to the residents and to the Navajo Laws of living.

The goal of environmental justice is to lower disproportionately high risks and consequences so that "no group of people, including racial, ethnic, or socioeconomic groups, should bear a

²Information for Navajo, New Mexico (NM 87328) Profile @ city-data.com

³http://quickfacts.census.gov/qfd/states/35000.html

⁴http://www.navajobusiness.com/pdf/CEDS/CED_NN_Final_09_10.pdf

disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies". The Community's goal is to revitalize this site and make it an economic advantage to their depressed community. The USEPA Brownfield Assessment grant for the NFPI site would help the Navajo Nation rebuild the town, abate health risk, and reuse the site to promote human moral and economic development.

At the NFPI site, there are abandoned structures, open foundations, and other infrastructure or equipment that is physically compromised due to lack of maintenance. There have been reports of illegal entry despite the presence of a fence. Thus, acts of vandalism are evident. Deterioration of the site may also pose safety risks. The site is a breeding ground for illegal activities such as arson and illegal dumping. Since 2012, there have been at least two arson fire incidents at the site. One incident destroyed part of the building that the RLC uses for office space.

The Indian Health Service (IHS) Hospital does not exist in the Navajo, NM community. Residents have to drive 9 miles from Navajo, NM to the Fort Defiance Service Unit (FDSU) IHS Hospital. The IHS does not possess the capacity to conduct health studies of each community; therefore, statistical data is not available. Although there is health and welfare related circumstances, the health of the Navajo community has been impacted by the NFPI site. These circumstances were documented by the NSP when the NSP received from the Navajo community verbally during community meetings and the NFPI site visits. At RLC meetings and home visits, the foremost complaint is breathing problems. Residents cite the continually burning NFPI dump site as the main reason for their chronic respiratory problems. There are no documented health effects for sensitive populations of the Navajo community or any other NN communities because the NN lags behind in health studies as compared to the other States and the United States. Instead, the Navajo community is a part of the FDSU which is one of eight major regional, organizational and administrative units within the Navajo Nation Area Indian Health service care system. Despite having some health data with the FDSU, the data has not been compiled in any study. The Indian Health Service Navajo Area Office (IHS-NAO) is the Headquarters Office which administers eight regional administrative units throughout the Navajo Nation. The 2007 health data from the FDSU only lists the highest morbidity factor as hypertension followed by diabetes, pneumonia followed by abnormal labor from outpatient diagnosis. The leading cancer diagnosis is breast cancer. There are the potential health impacts that the RLC community could experience as a result of exposure from hazardous materials currently at the NFPI site. These impacts would be critical for sensitive populations especially lung cancer and asbestosis due to presence of asbestos on the Site. Similarly, acute and chronic impacts to nervous, respiratory and reproductive systems and cancer could exist in the RLC community due to presence of petroleum and its products. In addition, the presence of various toxic heavy metals on the Site could impact to children on their impaired neurological development.

2.1.3 Financial Need

2.1.3.1 Economic Conditions

2.1.3.2 Economic Effects of Brownfields

Financial impacts to local tax and leasing values, increased apparent crime and blight, and reduced social services are all socio-economic problems sometimes created by Brownfields. The loss of an estimated 465 jobs resulted after the NFPI operations shut down. These factors cumulatively affected the economy's demise resulting in abandoned homes, vandalized homes now boarded up and an abandoned convenience store. The Navajo community has a high rate of low income households within the Navajo Nation; the median income was \$22,904 in 2009. This disadvantage is exacerbated further when one considers that the NFPI site takes up about 20% of developable area for redevelopment.

These noted disadvantages are further compounded by the fact that the Navajo Nation does not have many employment opportunities. The community has experienced economic downsizing due to the loss of the NFPI operations which contributed to the drop of employment affecting the unemployment rate that currently exists at 77.35%. Employment at the NFPI site had contributed to 88.87% of employment, 77.8% of household income, and 83.71% of sales revenue for the Navajo community. The contribution from the NFPI was very substantial and affected other local goods and services businesses that could no longer be purchased by the NFPI employees. Further, employees had to move away to seek other employment and local stores downsized or shut down. There is no data available on a decreased population due to moves, but is evident by many boarded up and vandalized houses. The NN lacks studies and no studies have been found of the residential vacancy rate.

There have been private companies that have initiated steps to securing the reuse of the NFPI site, a Brownfields site, for development of a Biorecycling Center. However, their interest ended when they realized the extent of required activities needed to complete the costly assessment and remediation process prior to reuse. This has prevented the re-creation of jobs, taxes, and restoration of the community. The NSP in partnership with the NNDED and RLC believes that the Navajo community can achieve redevelopment and the creation of jobs that would entice the local housing authority to renovate abandoned, vandalized, and dilapidated houses for families to reside in once again.

The poverty rate and unemployment rate are at disproportional percentages higher for the Navajo community than the Navajo Nation, the State of New Mexico (NM), and the U.S (Table 1). The contaminated NFPI site in the community of Navajo has directly affected the poverty rate, unemployment rate and median household income. Redevelopment of the NFPI site after assessment and cleanup is necessary to stimulate the economy through jobs and growth of the community as well as reduce the exposure of contamination to the residential community of Navajo.

The Navajo community must have federal funds to address Brownfields projects for economic redevelopment. The Navajo Nation is in economic distress with budget difficulties; therefore, the NN needs monetary assistance for any assessment for the targeted community. Although there has been a more recent and estimated annual budget of \$5 million for the NNDED, it has been decreasing annually and has never been enough to fund economic development. The annual budget has been for operations only and this year, the NNDED is

laying off personnel. The Navajo is not a township under the NN local governance act (LGA), therefore, the Navajo community cannot collect taxes to use for economic or social programs. Taxes have never been collected including the time when the NFPI was in operation because the NN infrastructure to collect taxes was not developed at that time. Now, the RLC is pursuing LGA Certification that ensures the presence of infrastructure, such as a sound financial management system and checks and balances of a local government. Competitive assessment grants as such have never been received for this site. Only a Phase I Environmental Assessment Cooperative Agreement was received and a report was completed in 2001 that represents assessment activities up through 1998 before the Small Business Liability Relief and Brownfields Revitalization Act became effective in 2002 (Appendix A). In 2012, an updated Phase I Environmental Site Assessment (ESA) Report was generated by Daniel B. Stephens & Associates, Inc. at the cost of NWNMCOG of Gallup, NM with partnership among the NSP, NNDED and RLC (Appendix A).

2.2 Project Description and Feasibility of Success

2.2.1 Project Description, Timing and Implementation

2.2.1.1 Project Description and Alignment with Revitalization Plans

The NN continues to strive for a sustainable and viable economy for an ever increasing population now greater than 300,000. The NN has established the LGA to allow Chapters to locally make more decisions based on their adopted Land Use Plan (LUP) toward benefits of increased new or redevelopment for businesses and new jobs, increased tourism and increased public awareness. The RLC has been making effort to become LGA certified. They have listed the NFPI site for economic redevelopment in their LUP, as found at http://redlake18.navajochapters.org under community LUP of the Chapter information section. Reuse of the site would provide hundreds of jobs for local and regional workers. The local economy would improve with these jobs and vacant housing will be occupied. New development of housing in new neighborhoods will be required for expansion and new arrivals. Expansion will require a new source of revenue for refurbishing or maintaining the new homes, for support of increased population such as food or clothing, and for entertainment such as a sports complex.

After cleanup of the NFPI site, LUP includes goals for mixed-use development such as a recycling business. With the planning assistance of the NNDED, they are taking steps to plan for a tire recycling facility and recreational projects in addition to the biomass facility for fuel and wood pellets. They now have schematic designs for parks, ball fields, and a swimming pool west and adjacent to the NFPI site, as indicated in the letter of support from the NNDED Director.

The partnership of the NSP, RLC and NNDED has further engaged in aesthetic cleanup of the abandoned and dilapidated metal building structures to prevent the continuation of unpermitted entrance into the site to stop risk of exposure to contamination, vandalism and partying. Aesthetic cleanup will immediately promote and support tourism as it is a federally listed "Scenic Byways" highway route that sets adjacent and west of the NFPI site. The Kiln building remains as Asbestos containing material exists throughout this structure. Next steps of removal cannot occur until funds are acquired, as the NN, NNDED, NSP and RLC do not have funds. In 2014, the Navajo Nation including the aforementioned partnership met with

the U.S. Senator, Tom Udall, to obtain assistance and a strategy for consideration of the Brownfields site development. In 2013, the NNEPA LUST program removed underground storage tanks (UST) and aboveground storage tanks (AST) as well as excavated to an estimated volume of 15,000 cubic feet contaminated soil. Petroleum contamination also exists and was found up to depth of six feet as the strong petroleum odors was present under wooden railroad tides.

2.2.1.2 Timing and Implementation

The Table 2 outlines the proposed schedule for the NFPI site. Changes may occur pending the scope of added comments from NSP and the public on draft plans and other unknown factors.

Table 2. Tentative timelines for hazardous substance and petroleum assessments of the NFPI site

	-	
Tasks	Schedule	Deliverables
Phase II Environmental Site Assessments-	Spring/Fall 2017	 Phase II ESA Report
Planning and Public Outreach		• RLC Community Meeting
		Minutes
Remedial Investigation/ Feasibility Study Report Revisions	Winter 2017/Spring 2018	Revised Draft Final RI/FS and Public CommentFinal RI/FS
Final Completion Report	Fall 2018	• Final Report
Regulatory Oversight by NSP	Ongoing	• Six Progress Reports

2.2.2 Task Description and Budget Table

2.2.2.1 Task Descriptions

Tasks to be conducted in the Site for assessment are described in Phase 1 ESA and updated Phase 1 ESA reports prepared in 2001 and 2012 respectively (Appendix A). Multiple users have been involved in the site for various activities (metal scrap material removal by dismantling the buildings and taking fixed assets) since abandonment of the NFPI site. The Phase I ESA identified list of chemicals of concerns and noted mismanagement of chemicals, the presence of potential contamination. However, the extents of contamination are yet to be determined. Recognized Environmental Conditions (REC) has also been documented in the Phase I ESA. According to the ASTM definition of REC, the presence or likely presence of hazardous substances or petroleum products with conditions have been documented in the site. The documents indicate an existing release, past release, threat of a release of hazardous substances or petroleum products into structures on the property. Such indications ensure that various media (soil, surface water and groundwater) on the site might have been severely contaminated. The ESA's documents illustrate a numerous RECs on the site, although the extents of contamination are yet to be determined. Therefore, the objective of this assessment is to perform a Phase II assessment, evaluation of remedial alternatives and planning documents needed to proceed to cleanup. The Phase II assessment will proceed first by determining contamination on surface and subsurface at the site and will not include the NFPI dumpsite and offsite contamination. The surface and subsurface contamination levels will be determined by collecting soil and groundwater samples as identified in the RECs. The collected samples will then be sent to certified laboratories for analysis of various PCOCs at the NFPI site. In addition, presence of various suspected metals will also be evaluated on the site using a portable NITON XRF analyzer.

The environmental concerns are hazardous and petroleum substances at the NFPI site and the dumpsite. The Table 3 illustrates the possible contaminants of concerns at various locations of the site based on historical operations and RECs. Hazardous substances include chlorinated compounds and metals, spilled petroleum oil, spent oil, unknown contents of 55-gallon drums, car battery acid, sodium aluminate, soda ash, precipitated solids, asbestoscontaining materials (ACM), untested electric transformers without PCBs certificates remain on site and unknown state of energized transformers and fluorescent light bulbs. These hazardous substances might be on unpermitted discharge areas, collapsed hard-piping, aboveground storage tanks areas. Waste motor oil was observed in the vehicle change-out pits, in 5-gallon cans, and stored improperly in other waste cans in the shops. Evidence of corroded metal posts was found in the Power House building#14 (Figure 2). Nearby wash and creek might have also contaminated by these hazardous substances and petroleum products potentially by leaching from the NFPI site and dumpsite.

Unrecorded and unreported activities while dealing with above hazardous substances might have warranted testing or soil survey for potential PCBs and mercury contaminations on the site. Screening for chlorinated compounds and metals in former buildings with vehicle change-out pits are needed due to spills. Spent oil or other spent liquids, like solvents and antifreeze, may not have been properly disposed of or recycled as there are no records of the disposal procedures to show best management practices. Former outside waste storage areas need to be tested for dichlorobenzene. Unauthorized use of some of the former buildings (such as building # 22, 14, 15, 5, 20) have also been documented and should be sampled for unauthorized use of equipment, chemicals and improper handling and storage of wastes. Unknown substances identified in thirteen former buildings are to be characterized through sampling and testing prior to correct disposal. Sludge sediment samples from Power House #14's interior side sumps and evaporation pits need to be characterized as the wastewater from the hot process contained chemicals that possibly consisted of lime, sodium aluminate, soda ash, other impurities, and solids precipitated and removed from the on-site water source and/or the domestic water source. Sediments in the open unlined drainage trench adjacent to the Power House and Sawmill buildings should be sampled and analyzed due to evidence of unpermitted discharges. Illegally discharged hazardous substances spilled from the collapsed hard-piping specific for sewage water was repaired without documentation of the event and therefore, needs to be tested. Testing is needed, for petroleum and other products, where stained soil exists in the area of the ASTs where containment was cracked and inadequate, the concrete was stained, no corrosion protection was identified, incorrect rubber hoses were used with leakage evident, and confusion of labeling existed. Hazardous chemicals leaching from the NFPI site and NFPI dumpsite would require collection of sediment samples from the Tohdildonih Wash and Black Creek because of residential use of the water for irrigation and livestock grazing in the area. Also, when the water is flowing, it is pumped into a canal that is pumped into the Red Lake where mercury has been identified in fish. Downstream water used for drinking by residents also needs to be tested.

Table 3. Contaminants of concerns in different media and locations of the Site

Area	Media	Potential Contaminants of
		Concern
Power House 14	Soil, air, groundwater	Asbestos Containing Material,
		lime, sodium, mercury,
		sulfuric acid
Green Chain 16	Soil, air	ACM
Dry Kiln 17 and 23	Soil, air,	ACM
Heavy Equipment 22	Soil, groundwater	Stoddard solvent, 1,1,1-
(note: these same PCOC also		Trichloroethane,
at Power House 14, Main		dichlorobenzene, lubricants,
Particle 20)		solvents, anti-freeze, acids,
		muriatic acid
Planar 6	Soil, air, groundwater	Possible polychlorinated
		biphenyl, mercury
Storage 8	Soil, air, groundwater	Possible polychlorinated
		biphenyl, mercury
Main Particle 20		Cesium-137, Americium-241,
		waste oil, formaldehyde
Warehouse 13	Soil, groundwater	Resins, degreasers, paint
		thinners, paints, antifreeze,
		brake and transmission fluid,
		motor oil,
Cooling Tower 28	Soil, groundwater	Acids
Dump	Soil, surface and groundwater	ACM, formaldehyde, DCB

2.2.2.2 Budget Table

Table 4 & 5 indicate distribution of budget by task for Hazardous substance and petroleum assessment. Based on the tasks description, the activities to be performed in the proposed assessment of the NFPI site have been classified into three categories: Task 1, Task 2 and Task 3. The Task 1 is for Phase II ESA; the Task 2 is for Remedial Investigation/Feasibility Study (RI/FS) and Task 3 is for the NSP oversight for both hazardous substances and petroleum assessments. The total amounts allocated for Task 1 are \$120,000 and \$92,000 for hazardous substances and petroleum assessments respectively. More than 90% of the funds in each assessment for Task 1 will be spent on contract support. The NSP oversight costs are less than 30% of total funds in each assessment. The NSP will provide oversight to review and comments on all documents including consulting with contractor, project management, public outreach and onsite visits. No equipment will be purchased and the NSP will use its own personnel protective equipment when necessary. If more involvement than estimated for the NSP oversight is required on the site, the NSP will provide in-kind services. The Task 2 will be performed by a qualified professional firm along with the Task 1 and therefore the amount allocated for the Task 2 is \$26,000 for each assessment. The Task 2 will evaluate the cleanup options for the NFPI site as per the USEPA's requirements. Once the RI/FS will be completed for both assessments, the RI/FS reports will be issued for public comments after the NSP's approval. Thus, the final RI/FS report will comprise of public inputs.

The NSP will request for bids from qualified licensed environmental professional firms to perform the assessments at the NFPI site and dumpsite. The result of these works will be Phase II ESA report as per the USEPA documentation requirements. The Scope of Work (SOW) provided by the professional firm will be reviewed by the NSP under the NSP Quality Assurance Program Plan and subsequently program input will be provided.

Table 4. Budget distribution by task for Hazardous substances assessment

Budget Categories	Task 1	Task 2	Task 3	Sub-Total
Personnel	-	-	\$38,000	\$38,000
Fringe benefit	-	-	\$16,000	\$16,000
Travel	\$5,000	-	-	\$5,000
Equipment	-	-	-	-
Supplies	\$4,000	-	-	\$4,000
Contractual	\$111,000	\$26,000	-	\$137,000
Sub-Total	\$120,000	\$26,000	\$54,000	
Total				\$200,000

Table 5. Budget distribution by task for petroleum assessment

Budget Categories	Task 1	Task 2	Task 3	Sub-Total
Personnel	-	-	\$23,000	\$23,000
Fringe benefit	-	-	\$10,000	\$10,000
Travel	\$4,000	-	-	\$4,000
Equipment	-	-	-	-
Supplies	\$1,000	-	-	\$1,000
Contractual	\$86,000	\$26,000	-	\$112,000
Sub-Total	\$91,000	\$26,000	\$33,000	
Total				\$150,000

2.2.3 Ability to leverage

Because of continued distress in the NN budget, no additional funding sources will be available from the NN. The NNDED also does not have funds for economic development. Similar situations occur in the Department of Community Development Office which oversees the community development block grant. The NNDED has been seeking resources among the NN Government, but to date has not found funds for the NFPI assessments. Loans are not completely set up to cover assessments because the land actually belongs to the U.S. Government, and is usually a medium to serve as collateral for a loan. The NN casinos are not fully developed, as they all have loans to pay off.

2.3 Community Engagement and Partnerships

2.3.1 Engaging the Community

The NSP conducted public meetings with the Navajo community to inform the Phase I ESA Report. The NSP will meet with the community people monthly at the meetings to create

resolutions. In addition, the NSP will encourage all other stakeholders to participate in the meetings throughout the project.

2.3.2 Partnership with Government Agencies

As mentioned previously, the NNDED is a partner to the RLC and NSP. They are ready to approve a business site lease for redevelopment of a biomass recycling and cogeneration business center after assessment and cleanup (Appendix B). The RLC has approved a resolution to support redevelopments by authorizing the use of the NFPI site after assessment and cleanup (Appendix C). All partners realize the environmental injustice obviously associated with the Navajo, NM community which are described under the section titled Impact of Brownfields (section 2.1.1.3).

The NSP will ensure the partners and the public are keeping abreast of the NFPI activities; will involve their participation and will ensure plans of assessment are adhered with progress reports shared. The partnership will be maintained to ensure that redevelopment success of the NFPI site occurs after assessment and cleanup. Table 6 describes all participants involved in this Brownfields assessment works.

Affiliation (Partner)	Contact Name	Contact Information
NNEPA Superfund Program	Freida S. White Environmental Program Supervisor	PO Box 2946 Window Rock, AZ 86515 Tel: (928) 871-6859
NN Division of Economic Development	Crystal J. Deschinny Division Director	PO Box 663 Window Rock, AZ 86515 Tel: (928) 871-6544
NN Red Lake Chapter#18	Arval T. McCabe Chapter President	PO Box 130 Navajo, NM 87328 Tel: (505) 777-2810

Table 6. Chart of partnership information

2.3.3 Partnership with Community Organizations

There are no organizations as such.

2.3.4 Letters of Commitment

The support letters from the NNDED and RLC are attached in Appendix B and C respectively.

2.4 Project Benefits

2.4.1 Welfare, Environmental, and Public Health Benefits

The NFPI site assessment will lead to improvements of the community's quality of life when ecological damages are reduced, abatement occurs to halt potential risks and threats. Reuse of the site will stimulate development and growth of the site. Residents will return and houses will be renovated to improve occupancy and more housing will be built. Abandoned buildings onsite could be reused creating a cost savings on energy and space by not having to build the same building on homesite or grazing leased areas. Other retail businesses would

develop for addressing the needs of the community, preventing excessive and cumulative mileage totals to drive off the Navajo Nation.

Sustainable redevelopment and reuse of the Brownfields site is well identified both by the Navajo community through the NN Red Lake Chapter (RLC), the NNDED, and the NSP. The partnership of the three NN government programs will:

- remove potential contamination onsite and those that migrated offsite
- reuse the buildings existing on the NFPI site
- recycle partially erected buildings or renovate
- build a sustainable stormwater system that can be recycled for green activities and to prevent source discharges
- reuse existing utilities and renovate those to save energy and
- incorporate energy saving devices throughout the entire buildings

Involving the community with the planned assessment, providing progress reports, and receiving public comments in decisions will empower the community to work with a transparent government that shares their concerns. The return of residents, change in housing improvements, and redevelopment of the NFPI site will foster hope, ownership, and appreciation for the community efforts. A Site assessment will lead to defined cleanup to address offsite areas of migration; will allow onsite removal of contaminated soil and chemicals; will prevent acute exposure to vandals that enter the site for a party, and will allow development to remove and keep graffiti off the buildings. Site assessment procedures will be reviewed by the NSP to require dust control, to contain any chemicals, and drilling waste to be covered securely and contained in a chain linked fenced area that will have posted signs to prevent any imminent risk. The local hospital that is approximately 9 miles away will be contacted, as standard practice, in case of an emergency.

2.4.2 Economic and Community Benefits

The selected contractor for the proposed NFPI site assessment will hire qualified staff from the local community. The NSP will contact the NN Workforce Development Office to find the qualified individuals. Development through construction of this site for the designated business will provide jobs for the unemployed and lower income residents. When business operations begin, unemployed and lower income residents will have long-term employment.

The Navajo Community will be enabled when development occurs to collect leasing fees. Currently, the NN does not have property taxes and personal property taxes as all land is held in trust by the US Government.

Redevelopment and planned operations of a Biomass Recycling and Cogeneration Business Center will lead to more than 700 jobs because companies add additional private biomass harvesting businesses throughout the NN. With the Biomass Recycling and Cogeneration Business Center, the effort for green renovated buildings may be included, as well as landscaping the area that is oriented to save energy.

2.5 Programmatic Capability and Past Performance

2.5.1 Audit Findings

The NSP has not received any adverse audits. The Navajo Nation policies required that the Purchasing Director approve all processes so that all contracts meet procurement

requirements of the USEPA grants. Internal controls are in existence as multiple approvals occur for all contracts, purchase orders, invoices, and monthly account reconciliation. The Navajo Nation conducts internal audits as needed and also hires external contractors to conduct annual audits.

2.5.2 Programmatic Capability

The NSP received Brownfields Economic Redevelopment Initiative funds to conduct a Phase I Environmental Assessment Grant of the NFPI site. The grant was awarded in FY97 and was completed in FY01. The project was named the Brownfield Pilot Project. The outcome of this assessment grant was a Phase I ESA Report in 2001 with interim progress reports of public outreaches/meetings with NNDED, RLC, the Navajo Community, and other Stakeholders. The report also contained a map of the buildings, list of chemicals in each, and recommendations for future actions for the next step, a Phase II ESA. Other outcomes were development of a video tape of the NFPI site activities that was used to educate the community, a Health and Safety Plan, and the development of a draft Sampling Plan that was planned for use in a future Phase II ESA. The grant funds were completely expended and all EPA grant requirements were met.

The Navajo Nation through the NSP recently passed the Navajo Nation Comprehensive Environmental Response and Compensation Act Law (NNCERCLA) in March 2008. The law is like the USEPA CERCLA and differs by including petroleum as a hazardous substance. The NSP will utilize the NNCERCLA to provide oversight of the NFPI site and will provide timely quarterly reports of the quarterly goals listed in the Scope of Work.

The Project Director, Freida S. White, as the current Environmental Program Supervisor, has assisted with the final Phase I ESA Project while being in the capacity of a Sr. Environmental Specialist. In this capacity, she has managed the initial development of the Brownfields Navajo Nation Response Program that included activities such as developing or enhancing documents with the significant outcome of the NNCERCLA. The Voluntary Cleanup Program is to undergo approval by the legislation process. As the current Supervisor, she has experienced technical staffs who have worked side by side with the USEPA to enforce Responsible Parties to assess and remediate contaminated sites. More technical staff participated in the Phase I ESAs, and performed preliminary assessments and site screens. These staff had oversight responsibilities of contractors from the inception of the project in the scope of work, to work plans, to review of technical documents, to sampling activities, to results of sample data, to reports to ensure activities are compliant with required USEPA regulations. Moreover, Freida S. White has managed five USEPA grants ranging from \$865,000 to 1,240,350 according to the USEPA requirements. The NSP constituted seven competent staff including IPA and therefore we believe that the NSP is able to perform different tasks related to the NFPI assessment and cleanup activities. The NSP has also involved in writing a white paper for disposing the NN AUM wastes which will be presented to the NN Uranium Commission (NNUC). The NNUC has had to begin with a NN executive order for the creation of a NN Uranium Task Force to ensure that all NN Branches, the community, and stakeholders were included. The white paper includes the vital aspects of experts consulting on the NN culture and science.

The NSP has experienced staff to perform oversight and other related tasks for the proposed proposal. Staffing includes Environmental Program Supervisor, Sr. Environmental Scientist,

Sr. Environmental Engineer, Sr. GIS Specialist, Sr. Public Information Officer and IPA. As needed, The NN Department of Justice Attorney experienced in the CERCLA law and the NNCERCLA law will be of assistance. The NSP will secure a qualified professional environmental firm to conduct the assessment work.

2.5.3 Measuring Environmental Results: Anticipated Outputs/Outcomes

The NSP has completed inventory for Brownfields sites within 6 Chapters of 110 Chapters to generate a list of more recent eleven sites. There are sites listed on the NSP website under the Brownfields Program titled Public Record at www.nnepasuperfund.org. With the inclusion of the NFPI site, there are twelve sites. One of the twelve sites has had onsite assessment completed with Targeted Brownfields Assessment Grant funds. The partnership among the NSP, NNDED and RLC has resulted in an updated Phase I ESA report completed by Northwest New Mexico Council of Governments in 2012 (Appendix A). Further partnership activity among the NNDED, RLC and NSP resulted in the aesthetic removal of buildings and its benefits. The NNEPA LUST program has removed ASTs and excavated contaminated soil until funds ceased and the scope of their work exceeded the LUST program criteria, leaving observed petroleum noted by its strong smell that may have migrated.

2.5.4 Past Performance and Accomplishments

The NSP has performed well and has not triggered the need for an audit. The NSP has made progress by completing onsite activities under the Targeted Brownfields Assessment Grant for one of the ten listed potential NN Brownfields sites resulting from the inventory of 6 chapters of 110 the NN Chapters. The report has not been generated thereby there is no assessment cost and determinations documented of required remediation for sites across the NN. The NSP looks forward to an opportunity for a successful assessment story on the NFPI site.

Appendix A: Phase 1 Environmental Site Assessment

Please see in the attachment

Updated Phase I Environmental Site Assessment

Former Navajo Forest Products Industries Site
Navajo, New Mexico
Project Site Code 87328-002

Prepared for

Northwest New Mexico Council of Governments Gallup, New Mexico

September 28, 2012



Daniel B. Stephens & Associates, Inc.

6020 Academy NE, Suite 100 • Albuquerque, New Mexico 87109



Table of Contents

Se	ection	Page
Ex	kecutive Summary	ES-1
1.	Introduction	1
	1.1 Purpose of Assignment	
	1.2 Scope of Work	2
	1.3 Significant Assumptions	3
	1.4 Limitations and Exceptions of Assessment	3
	1.5 Special Terms and Conditions	5
	1.6 User Reliance	5
2.	Site Description	6
	2.1 Site Location and Background	6
	2.2 Legal Description	8
3.	User-Provided Information	
	3.1 Title Records	
	3.2 Environmental Liens or Activity and Use Limitations	
	3.3 Specialized Knowledge	
	3.4 Valuation Reduction for Environmental Issues	
	3.5 Owner, Property Manager, and Occupant Information	
	3.6 Reason for Performing Phase I	10
4.	Records Review	
	4.1 Standard Environmental Record Sources, Federal, State, and Tribal	
	4.2 Physical Setting Sources	
	4.2.1 Geology	
	4.2.2 USGS 7.5-Minute Topographic Map	
	4.2.3 Hydrology	
	4.2.4 Flood Insurance Rate Map	
	4.2.5 National Wetlands Inventory	
	4.3 Historical Use Information	
	4.3.1 Aerial Photographs	
	4.3.2 Fire Insurance Maps	
	4.3.3 Property Tax Files	
	4.3.4 Land Title Records	
	4.3.5 Local Street Directories	
	4.3.6 Building Department Records	
	4.3.7 Zoning/Land Use Records	
	4.3.8 Other Historical Records	24
5.	Site Reconnaissance	
	5.1 Site Inspection	
	5.2 Methodology	
	5.2.1 Limitations	25



Table of Contents (Continued)

Se	ction	1		Page
		5.2.2	Frequency	27
		5.2.3	Uses and Conditions	27
	5.3	Gener	al Site Setting	27
			Current Use of the NFPI property	
		5.3.2	Current Uses of Adjoining Properties	28
		5.3.3	Current Uses in the Surrounding Area	28
		5.3.4	Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions	
		5.3.5	Potable Water Supply	
		5.3.6	Sewage Disposal System	
		5.3.7	Hazardous Substances and Petroleum Products Found in Connection with	
			Identified Current Uses(s) of Property	30
		5.3.8	Hazardous Substances and Petroleum Products Found in Connection with	
			Identified Past Use(s) of the Property	30
		5.3.9	Odors	
		5.3.10	Pools of Liquid	32
		5.3.11	Drums, Containers, and Sacks of Chemicals	32
			Underground Storage Tanks	
		5.3.13	Aboveground Storage Tanks	34
			Polychlorinated Biphenyls	
		5.3.15	Pits, Ponds, and Lagoons	35
			Stained Soil or Pavement	
		5.3.17	Stressed Vegetation	36
		5.3.18	Solid Waste	37
		5.3.19	Wastewater	38
		5.3.20	Wells, Septic Systems, and Pipelines	39
6.			Investigations	
	6.1	Asbes	tos-Containing Materials	40
	6.2	Rador	١	41
	6.3	Lead-	Based Paint	41
	6.5	Addition	onal User-Requested Conditions	42
7.	Inte	rviews		43
	7.1	Mr. Cł	nandra Manandhar Interview	
	7.2	Mr. Fr	ank Jishie Interview	44
	7.3	Mr. Ri	chard Bitsie Interview	44
	7.4	Mr. He	enry Haven Interview	44
8.	Find	lings w	ith Opinions	46
9.	Data	a Gaps		50
10	Con	clusion		51



Table of Contents (Continued)

Section	on Page
11	eviations
12. Qı	ualifications53
13. Er	nvironmental Professional Statement54
Refere	ences55
	List of Figures
Figure	e
1	Area Map7
2	Topographic Map13
3	1952 Aerial Photograph
4	1976 Aerial Photograph
5	1986 Aerial Photograph
6	1997 Aerial Photograph
7	2005 Aerial Photograph21
8	2011 Aerial Photograph
9	NFPI Building Locations
10	REC Site Locations



List of Tables

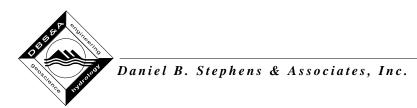
Table

1	Historical Use	. 15
2	Interview Summary	. 43
3	Findings Regarding Recognized Environmental Conditions and	
	Potential Impact to the NFPI Property, Navajo, New Mexico	. 47

List of Appendices

Appendix

- A 2001 Phase I ESA
- **B** EDR Reports
- C Photographs
- D Interviews
- E Statement of Qualifications



Executive Summary

Daniel B. Stephens & Associates, Inc. (DBS&A) was retained by the Northwest New Mexico Council of Governments (NWNMCOG) to conduct an updated Phase I environmental site assessment (ESA) for the Navajo Forest Products Industries (NFPI) property in Navajo, New Mexico. This ESA is an update of a previous ESA conducted by the Navajo Superfund Program, submitted in 2001. It is assumed that observations, conclusions, and recommendations indicated in the previous Phase I ESA remain valid except where superseded by information contained herein.

The project was performed in accordance with the scope of services and cost estimate prepared for the NWNMCOG under the U.S. Environmental Protection Agency Brownfields Program, with interest from the Division of Economic Development of the Navajo Nation, submitted on July 16, 2012. The ESA was performed in accordance with the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05. The lack of available historical records for the subject property and surrounding properties, particularly for nearby gasoline filling stations, constitutes a significant data gap that affected the ability of the environmental professional to identify recognized environmental conditions (RECs) as defined by ASTM E 1527-05.

The subject property was formerly used to manufacture lumber products, and consisted of 35 buildings on a 103-acre lot owned by the Red Lake #18 Chapter of the Navajo Nation (Red Lake). Property development began in 1958 for the production of lumber products. Since NFPI's closure in 1995, 20 of the original on-site structures have been removed or demolished, or have suffered heavy fire damage. Several buildings on the NFPI site are currently used by Red Lake, Nations Gas Technologies, Inc., and the Navajo Townsite Community Development Corporation. Other structures are currently unoccupied and in various states of disrepair.

Findings with Opinions

Known or suspected RECs associated with the NFPI property and nearby properties were evaluated. The NFPI property was determined to have multiple RECs due to historical usage.



Soil is impacted beneath the NFPI site, although the extent of the contamination is not known. Groundwater quality beneath the site has not been assessed, but may be impacted as well. Potential impacts to soil and groundwater under the NFPI site may be associated with the following RECs:

- Use, storage, and on-site disposal of potentially hazardous substances
- Discharge of sewage and industrial wastewater to the environment through unlined drainage ditches
- Areas of unclassified solid waste disposal present throughout the site
- Contaminated soil at the former transformer yard between Buildings #3 and #33, and other locations of electrical transformer operation, storage, or disposal
- Impacted or potentially impacted soils surrounding current or former AST installations, particularly those where petroleum impacts are evident

Although potential impacts related to the identified RECs are possible throughout the site, particularly notable documented incidences of known and potential RECs are associated with the following locations:

- Particle Board Building #20 and the adjacent Millworks Buildings #5 and #15, where hazardous materials and soil impacts have been identified in previous investigations
- Drainage ditches and wastewater conveyance piping
- Powerhouse Building #14 and associated pits, sumps, and cooling towers
- Warehouse Building #13 (vehicle maintenance trenches and hazardous materials noted in this and previous investigations)
- The former NFPI drum yard (the boneyard)
- Machine sumps in Particle Board Building #20Powerhouse Building #14 and the former Sawmill Building #10



- The former AST excavation site and associated fuel lines and fueling station
- Heavy Equipment Shop #22 (former vehicle maintenance trenches and leaking ASTs)
- Former transformer yard between Buildings #3 and #33

During the site reconnaissance, both asbestos-containing materials (ACMs) and lead-based paint (LBP) were tentatively identified at the subject property, although no confirmatory samples were collected. These materials would be expected given the age of the buildings. A limited visual mold screening was performed during the site inspection and multiple areas of moisture infiltration and potential microbial growth were observed.

Two sites with known or suspected RECs were identified near the NFPI property. Findings with regard to potential RECs on nearby properties are summarized in Table ES-1.

Table ES-1. Findings Regarding Recognized Environmental Conditions and Potential Impact to the NFPI Property, Navajo, New Mexico

Site Name	Approximate Distance from Site (feet)	Address	RECs	PI
Sandia Oil Navajo Conoco	150 (southwest)	Indian Service Route 12 and Shepard Spring Blvd	Х	Χ
Thriftway #238	620 (northwest)	Indian Service Route 12	Χ	Х

REC = Known or potential recognized environmental condition

PI = Potential impact to the subject property

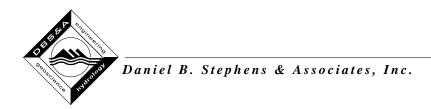
Conclusions

This assessment resulted in the identification of numerous RECs on the subject property, as well as nearby properties. Several of these RECs are known to impact the subject property, although the extent of the impact is not known. DBS&A recommends that a Phase II investigation be conducted at the subject property to determine the extent of impacts from these on- and off-site RECs at the subject property. The Phase II ESA will most likely involve, at a minimum, collection of soil (surface and subsurface) and groundwater samples to determine the nature and extent of impacts generated by the identified RECs.



ACMs and LBP were tentatively identified at the subject property. DBS&A believes that additional characterization of these materials should be performed prior to the demolition of the subject property buildings to determine what levels of protection are required by personnel working within the area.

DBS&A recommends that a microbial screening be performed prior to the demolition of the subject property building to determine what levels of protection are required by personnel working within the area.



1. Introduction

Daniel B. Stephens & Associates, Inc. (DBS&A) was retained by the Northwest New Mexico Council of Governments (NWNMCOG) to conduct an updated Phase I environmental site assessment (ESA) for the Navajo Forest Products Industries (NFPI) property in Navajo, New Mexico. The subject property was formerly used to manufacture lumber products, and consisted of 35 buildings on a 103-acre lot owned by the Red Lake #18 Chapter of the Navajo Nation (Red Lake). The project was performed in accordance with the scope of services and cost estimate prepared for the NWNMCOG under the U.S. Environmental Protection Agency (EPA) Brownfields Program and submitted on July 16, 2012. The ESA was performed in accordance with the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05 (ASTM, 2005). The lack of available historical records for the subject property and surrounding properties, particularly for nearby gasoline filling stations, constitutes a significant data gap that affected the ability of the environmental professional to identify recognized environmental conditions (RECs) as defined by ASTM E 1527-05.

1.1 Purpose of Assignment

The purpose of this assignment is to complete the following activities:

- Prepare an updated Phase I ESA report for the NFPI property, which is located in Navajo, New Mexico on land owned by Red Lake. This Phase I ESA is an update of a previous Phase I ESA issued in 2001 (NSP, 2001).
- Conduct "All Appropriate Inquiry" (AAI) as defined by the EPA (40 CFR Part 312).
- Permit the user (Red Lake) to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 as amended in 2002.
- Identify, to the extent feasible pursuant to the process prescribed in ASTM E 1527-05,
 RECs associated with the NFPI property. The identification of RECs may impose an

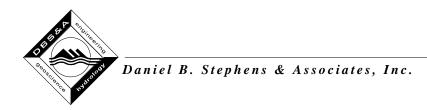


environmental liability on owners or operators of the site, reduce the value of the site, or restrict the use or marketability of the site; therefore, should RECs be identified, further investigation may be warranted to evaluate the scope and extent of potential environmental liabilities.

1.2 Scope of Work

Based on the environmental professional's analysis of need, subject to the limitations of ASTM E 1527-05 and within any additional limitations and deviations noted in this report, the updated Phase I ESA included the following scope of work:

- A review of records of federal, state, and local agencies, in accordance with ASTM E 1527-05, that might indicate RECs in connection with the property.
- A review of the physical setting sources for information about the geologic, hydrogeologic, hydrologic, or topographic characteristics with respect to the migration of hazardous substances or petroleum products to the property or from or within the property into the groundwater or soil.
- A review of historical sources to develop a history of previous uses of the property and surrounding area in order to help identify the likelihood of past uses having led to RECs in connection with the property.
- A site reconnaissance to visually and/or physically observe the property and any structures located on the property, to obtain information indicating the likelihood of identifying RECs in connections with the property.
- Interviews with past and present owners, operators, and occupants of the property to obtain information indicating RECs in connection with the property.
- Preparation of a report documenting findings, opinions, and conclusions.



1.3 Significant Assumptions

DBS&A assumes that there are no hidden or unapparent environmental conditions of the site, subsoil, groundwater, structures, or surroundings that would have an adverse effect on the property. DBS&A assumes no responsibility for such conditions or for engineering or inspections that might be required to discover such conditions.

Record and interview information furnished to DBS&A and contained in this report was obtained from sources assumed to be reliable and believed to be true and correct. This includes observations and findings presented in the previous Phase I ESA (NSP, 2001). However, DBS&A assumes no responsibility for any inaccuracies in such items that may be revealed as a result of subsequent action, either by DBS&A or others. Accuracy and completeness of record information vary among information sources, including governmental sources, and record information is often inaccurate or incomplete. DBS&A is not obliged to identify mistakes or insufficiencies in information provided. DBS&A will make a reasonable effort to compensate for mistakes or insufficiencies in the information reviewed that are obvious in light of other information of which DBS&A has actual knowledge at the time of preparation of the report.

1.4 Limitations and Exceptions of Assessment

This report is prepared in general accordance with ASTM E 1527-05. No items outside the scope of the ASTM standards of practice have been taken into consideration, except as noted.

The updated Phase I ESA reported herein was conducted by or under the supervision or responsible charge of the environmental professional signing this report.

No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of the ESA in accordance with ASTM E 1527-05 is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, and the practice recognizes reasonable limits of time and cost.



AAI does not mean an exhaustive assessment of a property. There is a point at which the cost of information obtained or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of the transaction.

This report is limited to information concerning observed physical characteristics of the property and adjacent properties, standard environmental and historical record sources, and interviews with owners, operators, occupants, and governmental agency personnel.

The time and cost constraints as agreed to by the user (as defined in Section 3 of this report) or his representative, as noted in the fully executed contract between DBS&A and NWNMCOG, may deem certain information common to the ASTM Phase I ESA process to not be reasonably ascertainable or practically reviewable.

Any sketches in the report may show approximate dimensions and are included to assist the reader in visualizing the property. DBS&A has made no survey of the site.

Except as noted in the report, DBS&A has conducted no off-site tests of materials or substances found on the site for the purpose of assessing the presence of RECs not readily apparent during a visual inspection.

DBS&A will not be required to give testimony or appear in court or in other hearings or formal discussions regarding the NFPI property or this report as part of this Phase I ESA.

DBS&A has estimated neither the cost of the impact on the property nor the costs necessary to eliminate the RECs.

In accordance with ASTM E 1527-05, this report is presumed to be valid for a period of 180 days from the date of the report. If the user desires to qualify for the landowner liability protections under CERCLA, certain components of the report must be conducted or updated within 180 days of and prior to the date of acquisition of the NFPI property.



This report may not be reproduced either whole or in part or updated by any party except with the express written permission of DBS&A.

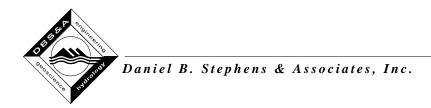
1.5 Special Terms and Conditions

No other special terms or conditions are applicable to this report.

1.6 User Reliance

This report is prepared for the sole benefit of the user of this report as defined in Section 3 of this report and may not be relied upon by any other person or entity without the written authorization of DBS&A.

Each subsequent user must satisfy the user's responsibilities set forth in Section 6.0 of ASTM E 1527-05 to qualify for the landowner liability protections under CERCLA.



2. Site Description

2.1 Site Location and Background

The subject property is located on the northeast corner of Indian Service Route 12 and Shepard Spring Boulevard in Navajo, New Mexico (Figure 1). Navajo is located in McKinley County, in the northwest corner of New Mexico.

The NFPI property is approximately 103 acres, and at one time contained 35 permanent structures that occupied 714,971 square feet (NSP, 2001). Of these 35 structures, 20 have been removed or demolished, or have suffered heavy fire damage. The U.S. federal government under the authority of the Department of the Interior's Bureau of Indian Affairs (BIA) holds the land in trust for the Navajo Nation.

In 1958, the Navajo Nation started NFPI to utilize the tribal timber resources. The Navajo Nation Council withdrew the area for the NFPI operation in November 1960. NFPI began sawmill operations in 1962 and employed over 300 local residents. Over the years, the mill site expanded to include the particleboard factory, maintenance shops, and millworks building. From 1958 to 1988, the facility milled an average of 40 million board feet of lumber with annual sales exceeding \$20 million. In 1983, Ponderosa Products Industries (PPI) leased the particleboard plant, which used sawdust and wood chips to fabricate particleboards, until PPI closed in 1991. During this period, portions of the NFPI site were used to store hazardous wastes, solid waste, waste oil, and machine parts.

In 1992, the Navajo Nation Ten-Year Forest Management Plan (FMP) expired. The BIA Navajo Area Office determined that logging could not continue under an expired FMP. NFPI continued operations using timber from national forest and private land sales, but this source was too costly to sustain. In April 1995, remaining employees were laid off and the facility went on a temporary shutdown until a cost-effective timber source could be identified.

In February 1998, the Navajo Nation approved a business lease for Millennial Homes, Inc. (MHI) to establish a residential housing and commercial buildings manufacturing operation in

Daniel B. Stephens & Associates, Inc., JN ES10.0079.09

Path: S:\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\G\S\MXD\\Fig01_area_map.mxd



Daniel B. Stephens & Associates, Inc.

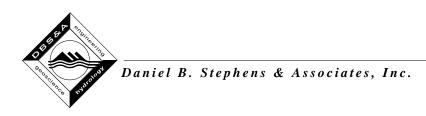
Storage Building #8. Between February 1998 and January 1999, MHI employed 25 individuals who constructed two modular homes and one partial home. During their occupancy, it was reported that MHI personnel removed equipment and structure materials from other buildings for its assembly-line construction operations in Storage Building #8. MHI also used Heavy Equipment Building #22, although their lease specified that their operations be confined to Storage Building #8. In January 1999, MHI ceased its operations at the NFPI site.

The NFPI property is currently unused and the remaining structures unoccupied, with the exceptions noted in Section 5.3.1.

NFPI also maintained an off-site dump that was used for the disposal of waste wood debris and other solid waste generated by site operations. Navajo Superfund Program (NSP) staff investigated potential environmental impacts and releases of hazardous chemicals/wastes at the dumpsite. EPA Region VI determined that no further action would be taken on the NFPI dumpsite. The dumpsite is considered outside the scope of this updated Phase I ESA.

2.2 Legal Description

No legal description for this property could be obtained. Coordinates for the subject property are latitude (north) 35.5445 and longitude (west) 109.1111.



3. User-Provided Information

The users of this ESA are Red Lake and NWNMCOG. The types of information provided to DBS&A by the users are outlined in Sections 3.1 through 3.6.

3.1 Title Records

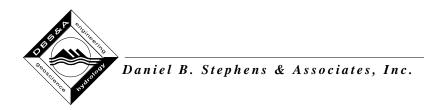
In accordance with ASTM E 1527-05, it is the user's responsibility to provide a chain of title search on the NFPI property to the environmental professional conducting this ESA, if the user determines that such information is required in the conduct of this assessment. No title records could be obtained from the Navajo Nation, Red Lake, or Environmental Data Resources, Inc (EDR).

3.2 Environmental Liens or Activity and Use Limitations

In accordance with ASTM E 1527-05, it is the user's responsibility to check recorded land title records to identify to the environmental professional conducting this ESA any recorded environmental liens and/or activity and use limitations (AULs). The user reported no environmental liens and/or AULs.

3.3 Specialized Knowledge

In accordance with ASTM E 1527-05, it is the user's responsibility to communicate any information based on specialized knowledge or experience that is material to RECs in connection with this property. The user provided a previous Phase I ESA performed by the Navajo Superfund Program of the Navajo Nation Environmental Protection Agency in 2001 (NSP, 2001). This document is provided in Appendix A. It is assumed that the observations and conclusions contained in that document were valid at the time of submittal, and remain valid except where superseded by information contained herein.



3.4 Valuation Reduction for Environmental Issues

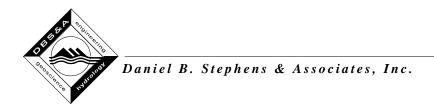
In accordance with ASTM E 1527-05, it is the user's responsibility to report actual knowledge that the purchase price of the property is significantly less than the purchase price of comparable properties and to try to identify an explanation for the lower price and to make a written record of such explanation. The user has not reported a significantly reduced purchase price.

3.5 Owner, Property Manager, and Occupant Information

Development of this property was initiated by the Navajo Nation in 1958. Closure of the facility occurred in 1995. The Navajo Nation maintains ownership of the property.

3.6 Reason for Performing Phase I

In accordance with ASTM E 1527-05, it is the user's responsibility to identify the reason for performing the ESA, which may include (1) the intention to satisfy one of the requirements to qualify for one of the landowner liability protections under CERCLA (i.e., innocent landowner, bona fide purchaser, or contiguous property owner) or (2) the need to understand any potential environmental liabilities that could materially impact the operation of the business associated with the parcel of commercial real estate.



4. Records Review

4.1 Standard Environmental Record Sources, Federal, State, and Tribal

DBS&A contracted with EDR to search all existing databases, including federal, state, and tribal environmental records, to search for known and suspected sites of environmental contamination and evaluate the proximity of potential RECs relative to the NFPI property (EDR, 2012). From the federal, state, and tribal environmental records database listings specified in ASTM E 1527-05, EDR identified two additional sites of interest within the approximate minimum search distance (AMSD) of the NFPI property: (1) Sandia Oil Navajo Conoco, an active gasoline filling station, and (2) Thriftway #238, an inactive gasoline filling station.

EDR's environmental database search found 44 orphan sites associated with the query for Navajo, New Mexico. Orphan sites are properties with unknown or poor address information. Of these 44 sites, 42 were either found to be located outside the target search area or are redundant with potential REC sites documented elsewhere. The other 2 orphan sites were the Conoco station immediately to the south of the subject property and an abandoned Thriftway #238, located to the north of the subject property. These sites have potential RECs that may affect the subject property and are evaluated in this report.

The information provided by EDR is subject to EDR's data disclaimer. Copies of the EDR research data and a description of the databases are provided in Appendix B.

4.2 Physical Setting Sources

DBS&A searched numerous physical setting sources as detailed in Sections 4.2.1 through 4.2.5. No environmental problems due to geologic, hydrogeologic, hydrologic, or topographic characteristics of the NFPI property were noted, nor were conditions identified in which hazardous substances were likely to migrate to the property or from within the property into the groundwater or soil, except as noted.



4.2.1 Geology

Navajo, New Mexico is situated in the Colorado Plateau physiographic province, on the eastern edge of the Defiance Uplift and the Buell Park volcanic area (Thaden, 1990). Underlying the site are unconsolidated alluvial and eolian deposits of silt, sand, and gravel (NSP, 2001). The thickness of the alluvial material is likely to be approximately 50 to 80 feet based on cross sections provided in Thaden (1990) and borehole data described by Akers et al. (1962). The alluvial and eolian deposits are underlain by the fine-grained rocks of the Triassic-age Chinle Formation and Wingate Sandstone. Bedrock formations typically dip to the east at 15 to 20 degrees, forming hogback ridges. Distinctive outcrops of the Jurassic-age Entrada sandstone are visible to the north and east (Appendix C, Photograph 28). Frog Rock, a prominent volcanic neck, dominates the skyline to the northeast (Appendix C, Photograph 31).

The EDR report (Appendix B) indicates that soil in the area of the subject property may be fine sandy loam. This soil contains materials classified as loam and sandy loam, signifying a high silt and sand content. The soils are considered well drained with a moderate infiltration rate.

4.2.2 USGS 7.5-Minute Topographic Map

The U.S. Geological Survey (USGS) 7.5-minute quadrangle map for Buell Park, Arizona, prepared in 1982 (Figure 2; Appendix B), indicates that the NFPI property is located in an area that slopes slightly to the north-northwest, with a surface elevation of approximately 7,098 feet above mean sea level (feet msl). The NFPI property is located in the northern portion of Navajo, on the northeast corner of Indian Service Route 12 and Shepard Spring Boulevard. The surrounding area to the south is developed with residential and commercial properties. No additional potential RECs not noted elsewhere were indicated by the topographic map.

4.2.3 Hydrology

Based on the surface topography as interpreted from the USGS 7.5-minute quadrangle for Buell Park, Arizona (Figure 2; Appendix B), shallow groundwater beneath the subject property is anticipated to flow to the northwest or west, toward Tohdildonih Wash and Black Creek.

Path: S\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig02_topo_map.mxd



Daniel B. Stephens & Associates, Inc.

Actual groundwater flow direction can be locally influenced by many factors, including underground structures, seasonal fluctuations, local soil variations and geology, production wells, and other factors that are not included in the scope of this report. The actual groundwater flow direction under the subject property can only be accurately determined by installing groundwater monitor wells, which was beyond the scope of this project.

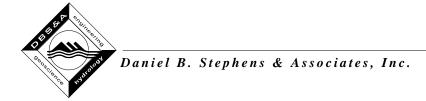
Groundwater in the area is recharged by surface water infiltration from Tohdildonih Wash to the north (NSP, 2001) and other local drainage pathways originating on Zilditloi Mountain to the east. EDR (2012) does not report current depth to groundwater at the subject property; however, three wells were reported in the vicinity of the property. Water levels in these three wells were between 18 and 27 feet below ground surface (bgs) in 1968 (EDR, 2012). Akers et al. (1962) reported alluvial groundwater at depths of 15 to 20 feet bgs in the area southwest of Frog Rock, in the vicinity of the subject property. It is not known if the wells reported in EDR (2012) are the same as those observed by Akers et al. (1962). Groundwater was reported to be present at the subject property at approximately 55 feet bgs in 2001 (NSP, 2001), although visual observation of water present in well #28, in the southeastern part of the site, indicates that the current depth to groundwater may locally be shallower. No records were available indicating the depth of the wells, the screened intervals, or the borehole geology.

4.2.4 Flood Insurance Rate Map

The EDR database search of Federal Emergency Management Agency (FEMA) flood zones identified FEMA Flood Insurance Rate Map Panel 35031C, which covers Navajo. This map shows that the NFPI property does not lie within the 100- and 500-year flood areas (Appendix B).

4.2.5 National Wetlands Inventory

A National Wetlands Inventory (NWI) quadrangle was not available for the NFPI property.



4.3 Historical Use Information

Historical sources were consulted to develop a history of the previous uses of the property and the surrounding area to help identify the likelihood of past uses having led to RECs in connection with the NFPI property. All obvious uses of the property were identified from the present back to the first developed use of the property or back to 1940, whichever is earlier, in accordance with ASTM E 1527-05, Section 8.3.2. Findings for all historical record sources, including descriptions and interpretations of the NFPI property and surrounding area, are summarized in Table 1 and discussed in Sections 4.3.1 through 4.3.8. A detailed site history compiled from multiple sources is presented in NSP (2001) (Appendix A).

Table 1. Historical Use

Period	Source(s)	Property	Surrounding Area
1952	Aerial photographs	The 1952 aerial photograph shows no development of the subject property.	Development of adjacent parcels is not apparent in the 1952 photograph.
1958	NSP (2001)	According to NSP (2001), the property was developed beginning around this time for the manufacturing of lumber products	No information
1976–1997	Aerial photographs	The 1976 photograph shows progressive development on the NFPI property through 1997.	The surrounding area shows progressive development through 1997. The Thriftway station appears to have been constructed between 1976 and 1986. The structure on the Conoco filling station property was expanded between 1986 and 1997.
1997–2011	Aerial photographs, NSP (2001)	The 2005 and 2011 photographs show demolition of various structures on the NFPI site, most notably the Millworks Buildings #5/#15 and the Sawmill Building #10.	The Conoco filling station configuration was changed between 1997 and 2005. The Thriftway station may have been abandoned early in this period, as the appearance of the property changes on the 2005 aerial photograph. The surrounding commercial and residential properties reached the current state of development prior to the 2005 photograph.



4.3.1 Aerial Photographs

DBS&A obtained reproducible copies of aerial photographs of the NFPI property from the USGS and the University of New Mexico Earth Data Analysis Center (EDAC) in Albuquerque, New Mexico, including aerial photographs from 1952, 1976, 1986, 1997, 2005, and 2011 (Figures 3 through 8). The aerial photographs demonstrate that the area was undeveloped as of 1952 and that the NFPI property development occurred by 1976.

The review of aerial photographs has identified several findings associated with the NFPI property, as follows:

- A historical aerial photograph from 1952 (Figure 3) obtained from EDAC shows that the subject property and surrounding area were undeveloped, with the exception of some agricultural development in the north.
- Historical aerial photographs from 1976 (Figure 4) obtained from EDAC show that the NFPI property is developed with multiple structures on it. Limited residential properties can be identified in the central and southern portions of the photograph.
- Historical aerial photographs from 1986 and 1997 (Figures 5 and 6) obtained from EDAC show continued development on the subject property and additional residential and commercial development along the southern property boundary.
- Historical aerial photographs from 2005 and 2011(Figures 7 and 8) obtained from EDAC show demolition of numerous buildings on the subject property. Adjacent residential and commercial properties attain approximately their current configuration in the 2005 photograph.

4.3.2 Fire Insurance Maps

A Sanborn fire insurance map search was conducted for this assessment. The property is listed as unmapped (Appendix B).

 $\textbf{Source:} \ \ \text{Imagery from the U.S. Geological Survey (USGS), published 1952}.$

0 500 1000 Feet

Explanation

Navajo Forest Products Industries



NFPI PHASE I ESA 1952 Aerial Photograph

Path: S.\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig03_1952_map.mxd

Daniel B. Stephens & Associates, Inc., JN ES10.0079.09

Path: S.\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig04_1976_map.mxd

NFPI PHASE I ESA

1976 Aerial Photograph

500 Feet

Explanation

Path: S.\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig05_1986_map.mxd

Navajo Forest Products Industries

1000



NFPI PHASE I ESA 1986 Aerial Photograph

Source: Imagery from the U.S. Geological Survey (USGS), published 1997.

Explanation

500

Navajo Forest Products Industries

Feet



NFPI PHASE I ESA 1997 Aerial Photograph

Path: S.\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig06_1997_map.mxd

Daniel B. Stephens & Associates, Inc. JN ES10.0079.09

Path: S.\Projects\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig08_2011_map.mxd

Explanation

Navajo Forest Products Industries



NFPI PHASE I ESA **2011 Aerial Photograph**



4.3.3 Property Tax Files

Property tax files were not queried for this assessment.

4.3.4 Land Title Records

A title search was not conducted for this assessment.

4.3.5 Local Street Directories

City directories have been compiled for larger metropolitan areas since the 1880s, primarily as a method of contacting individuals for marketing purposes. These directories provide cross-referenced information, indexed by property owner's name, street address, telephone number, and often business name. These resources are useful in determining dates and types of businesses by using either the address or the business name index. Similar to the aerial photograph review, a review of city directories provides insight as to business operations that may have adversely impacted the NFPI property in the past.

DBS&A subcontracted with EDR to research city directories in the study area. EDR's search indicated "no coverage" (Appendix B).

4.3.6 Building Department Records

The complete collection of building permit data available to EDR was searched; however, as of August 2, 2012, EDR did not have access to building permits for Navajo, New Mexico. Records could not be obtained from Red Lake or the Navajo Nation.

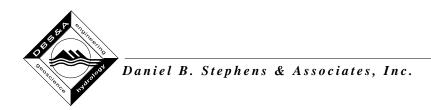
4.3.7 Zoning/Land Use Records

Zoning records could not be obtained from Red Lake or the Navajo Nation.



4.3.8 Other Historical Records

No other historical records were discovered.



5. Site Reconnaissance

DBS&A conducted a site reconnaissance to obtain information indicating the likelihood of identifying RECs in connection with the subject property. Visual and/or physical observations of the NFPI property on the day of the site visit are summarized in Sections 5.1 and 5.2. Photographs taken during the site visit are provided in Appendix C.

5.1 Site Inspection

The NFPI property reconnaissance was conducted on August 23, 2012 by Mr. Jason Raucci of DBS&A. Weather conditions were rainy with temperatures in the 70s (degrees Fahrenheit [°F]). Mr. Frank Jishie, Industrial Development Specialist for the Navajo Division of Economic Development (DED), gave Mr. Raucci a tour of the property, along with Mr. Anthony Perry of the Navajo Department of Economic Development and Mr. Chandra Manandhar of the Navajo Nation Environmental Protection Agency (NNEPA). The site reconnaissance consisted of observing the condition of the NFPI property and noting any signs of previous use or development and the presence of potential RECs. Particular attention was given to areas identified in the previous Phase I ESA (Appendix A) as containing known or potential RECs. The current site layout and building status is presented in Figure 9.

Of the 35 permanent buildings shown on Figure 9, 17 have been destroyed or otherwise removed. Of the remaining 18 buildings, 3 were severely damaged by fires in the summer of 2012 (Main Particle Building #20, Powerhouse #14, and Warehouse #13), and 6 are currently in use (Section 5.3.1).

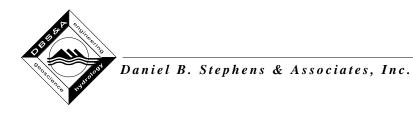
5.2 Methodology

The method used to observe the NFPI property was 100 percent visual inspection.

5.2.1 Limitations

There were no limitations to conducting a thorough review.

JN ES12.0058.01



5.2.2 Frequency

For the purpose of the preparation of this report, a single visit to the NFPI property was conducted on Thursday, August 23, 2012. All observations were made at the time of this visit.

5.2.3 Uses and Conditions

The subject property is in large part unused and in disrepair due to fire, vandalism, salvage operations, and general neglect. The environmental professional conducting the reconnaissance noted the uses and conditions specified in Sections 5.3.1 through 5.3.20 to the extent that they were visually or physically observed during the visit. The uses and conditions specified were also the subject of questions asked as part of the interviews of city and county officials. The environmental professional performing the updated Phase I ESA identified uses and conditions only to the extent that they may be visually and physically observed on a site visit, as described in ASTM E 1527-05, or to the extent that they were identified by the interviews or record review processes described in ASTM E 1527-05. Interview documentation is provided in Appendix D.

5.3 General Site Setting

5.3.1 Current Use of the NFPI property

The NFPI property is currently used by Red Lake administration, the Navajo Townsite Community Development Corporation (NTCDC), and Nations Gas Technologies, Inc. (NGTI). NGTI is currently operating as a natural gas supplier for the community of Navajo, and uses Building #1 and Storage Building #21 for its operations. NGTI maintains a propane tank stockpile adjacent to Building #21 (Appendix C, Photograph 27) and two large tanks across the road to the south, adjacent to Building #3. Buildings #22, #4, and #33 are currently used for storage by Red Lake. Tools and various equipment appear to be stored in Building #33, stacked cordwood in Building #4, and miscellaneous community supplies such as sporting goods and construction materials in Building #22. Building #3 is occupied by the NTCDC offices. Other structures are currently unoccupied and in various states of disrepair.



5.3.2 Current Uses of Adjoining Properties

Appendix C provides photographs of the NFPI property and surrounding area. The current uses of adjoining properties are as follows:

• To the north: Tohdildonih Wash, an electrical substation, and vacant land

• To the south and east: Commercial and residential properties

• To the west: Indian Service Route 12, vacant land

5.3.3 Current Uses in the Surrounding Area

The current properties in the surrounding area consist of residential and commercial development and vacant land (Figure 10). Residences and commercial properties of the town of Navajo lie primarily to the south of the subject property.

Two underground storage tank (UST) sites were identified near the NFPI property. Sandia Oil Navajo Conoco, located on the southwest corner of Indian Service Route 12 and Shepard Spring Boulevard, is an active gasoline filling station. Thriftway #238 is an inactive (abandoned) UST site located on Indian Service Route 12 where it crosses Tohdildonih Wash, northwest of NFPI (Figure 10). The Navajo Tribal Utility Authority (NTUA) sewage lagoons and Black Creek are located across Indian Service Route 12 to the west.

5.3.4 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

The topography of the NFPI property is generally flat, sloping slightly to the north-northwest, with a surface elevation of approximately 7,098 feet msl. General area topographic conditions in connection with geologic, hydrogeologic, and hydraulic conditions are not likely to facilitate the migration of hazardous substances or petroleum products to or from the subject property into the groundwater or soil, except as noted.



Navajo Forest Products Industries

REC site location

Daniel B. Stephens & Associates, Inc. JN ES10.0079.09

NFPI PHASE I ESA **REC Site Locations**

Path: S\Projeds\ES10.0079_NWNMCOG\ES10.0079.09_NFP\\GIS\MXD\Fig10_rec_map.mxd



5.3.5 Potable Water Supply

The NFPI property was served by a well located in Buell Park, several miles west of the site, until 1970 when a connection to the NTUA was completed. NFPI site operations used four on-site groundwater wells for industrial and fire suppression purposes (NSP, 2001).

5.3.6 Sewage Disposal System

The gray water (sink and toilet discharge) waste stream from the facility was directed to the former outdoor sump south of the Powerhouse Building #14, where it was combined with the facility process water and discharged off-site to the NTUA sewage lagoons. The pipeline to the NTUA sewage lagoons collapsed in 1990, and subsequent discharges were directed to the environment through unlined surface drainages on the NFPI site. This pipeline was reportedly repaired in 1992, but documentation of the repair is not available (NSP, 2001).

5.3.7 Hazardous Substances and Petroleum Products Found in Connection with Identified Current Uses(s) of Property

NGTI stores pressurized propane gas in two large tanks near Building #33; other tanks are stored in the yard adjacent to Building #21. Various household and construction-related hazardous materials, such as paint, cleaners, and aerosol cans, are stored in the Heavy Equipment Shop #22 and the Shed #3. No other hazardous substances were identified in connection with the current use(s) at the NFPI property.

5.3.8 Hazardous Substances and Petroleum Products Found in Connection with Identified Past Use(s) of the Property

Hazardous substances were reported to be generated, used, and stored at many of the NFPI facilities during the operational period between 1962 and 1995 (NSP, 2001). These hazardous substances included, but may not have been limited to, the following: adhesives, resins, acids, water treatment chemicals, chlorinated solvents and degreasers, and various petroleum-based fuels and lubricants. The NNEPA identified the Particle Board Building #20, the Heavy



Equipment Shop #22, and the Powerhouse #14 as generators of hazardous materials, including Stoddard Solvent, 1,1,1-trichlorethane, dichlorobenzene, lubricants, solvents, and antifreeze (NSP, 2001). Significant findings of hazardous material use, storage, or disposal include:

- Hazardous waste was previously stored at the NFPI drum yard (aka "boneyard"), located in the open field north of Building #22 (NSP, 2001), while awaiting disposal. Soil in this area was found to be contaminated with dichlorobenzenes (DCBs) in 1991. Although some soil was excavated and removed, the extent of contamination was not determined (NSP, 2001). DCBs and other chlorinated solvents were also identified in soil samples collected near the Particle Board Building #20 and former millworks site (Buildings #5 and #15).
- Sulfuric acid and corrosive solutions of sodium and other chemicals were used at the Powerhouse Building #14 and Cooling Tower Building #28 to treat process water (NSP, 2001). Evidence of the use and storage of these products was present during site reconnaissance in 1997, 1999, and 2012. Severely damaged concrete pillars on the ground floor of Building #14 attest to the corrosive conditions present during site operation (Appendix C, Photograph 14).
- Buildings #13 and #22 were used for large equipment maintenance, and were reported
 to contain oils, lubricants, paints, caustic rust removers, fuel products, and solvents.
 Vehicle maintenance pits were present in both buildings during the 1997 and 1999 site
 inspections, and contained discolored water with floating free products. The vehicle
 maintenance pits have since been filled with cement in Building #22, but are still present
 and filled with discolored water and debris in Building #13 (Appendix C, Photograph 21).
- Buildings #20 and #14 each had below-grade concrete machine sumps and drainage features partially filled with discolored, oily water (Appendix C, Photographs 2 and 12).
 Similar features were noted at the concrete slab of the former Sawmill Building #10, now filled with solid waste debris (Appendix C, Photograph 11).



Daniel B. Stephens & Associates, Inc.

Most evidence of hazardous waste disposal has been removed from the boneyard area, which is now primarily an open field with peripheral areas of solid waste disposal (Appendix C, Photographs 30 and 31).

5.3.9 Odors

Sharp chemical odors were noted in Building #14 at the time of site reconnaissance. Fuel odors were noted in the excavation at the former aboveground storage tank (AST) location east of Building #13. A charred smell was prevalent throughout the facility, particularly in fire-damaged structures. No other odors of a hazardous origin or of a petroleum-based product were noted at the NFPI property.

5.3.10 Pools of Liquid

No pools of liquid of a hazardous origin or a petroleum-based product were noted at the NFPI property, other than those discussed elsewhere.

5.3.11 Drums, Containers, and Sacks of Chemicals

Empty drums and containers of various shapes and sizes were present throughout the site, located inside and outside of structures and found either singly or associated with areas of solid waste deposition. In most cases it is not known what the drums contained or where the contents were discharged. The previous Phase I report (Appendix A) extensively documented the location and nature of drums and other known or potential chemical containers on the NFPI site at the time of that report. Significant instances of drums or chemical containers present at NFPI during the August 23, 2012 site reconnaissance include the following:

 A tank of an unknown liquid was present in the entryway to the Thayer Scale Building #27 (Appendix C, Photograph 24). The building also contained numerous empty cans and jars.

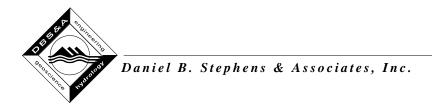


- A large, partially full plastic tank labeled "corrosive" was present on the ground floor of the Powerhouse Building #14 (Appendix C, Photograph 17). Several smaller, similarly labeled barrels were present in other rooms of the structure. Similar barrels were found melted in the fire-damaged portion of the building (Appendix C, Photograph 13). Numerous other overturned, burned drums and containers were present in the building. Other labeled chemical containers containing mercury and sulfuric acid, noted in the previous Phase I ESA, were not observed in Building #14.
- In the Warehouse Building #13, a 55-gallon drum and two smaller containers were observed to contain a black, viscous fluid, possibly used motor oil. The building also contained numerous empty cans and containers of various sizes (Appendix C, Photograph 13).
- Two 55-gallon drums were loaded on a pallet and placed along the roadside near Building #21. The drums appeared full and sealed, and labeling indicated a commercial lubricant called "Sawglide".
- Three full, sealed, unlabeled drums were stacked near the old fueling stands north of Building #22 (Appendix C, Photograph 19).

Drums previous stored in the boneyard area north of Building #22 were not observed during the 2012 reconnaissance. Numerous other unlabeled drums and containers were present throughout the site, typically empty or filled with construction debris or other solid waste.

5.3.12 Underground Storage Tanks

DBS&A did not find any fill pipes, vents, or other evidence of USTs on the NFPI property. USTs were not reported in previous assessments or in interviews.



5.3.13 Aboveground Storage Tanks

At least 12 ASTs have historically been present at the NFPI site, 8 of which have been removed. Known ASTs, associated facilities, and related RECs are summarized in the following paragraphs.

In 2012, 8 fuel ASTs were removed from the area east of the Warehouse Building #13 (Haven, 2012). Following tank removal, soil was excavated from around the tankhold area and found to be "saturated with diesel fuel." The most heavily impacted soil was removed from the site and disposed of at a permitted facility (Haven, 2012). Soil samples were collected, and analytical results were provided to the Regional Business Development Office (RBDO). Although copies of the laboratory results could not be located at the time of this report, Mr. Henry Haven of NNEPA indicated that the laboratory results indicated contamination by diesel fuel. The tankhold excavation is approximately 50 feet by 50 feet and 6 feet deep (Appendix C, Photograph 18). Fuel odors were noted in the area surrounding the excavation at the time of site reconnaissance, and soils within and adjacent to the pit smelled strongly of petroleum. The buried pipeline to the fuel station remains in place, as do the fueling pumps (Appendix C, Photograph 19). According to Mr. Haven, fuel contamination was not detected at the fueling stand location.

Two ASTs are present at Building #22. The large tank on the west side of the structure, labeled "used oil", was used to contain waste solvent from the vehicle maintenance shop (NSP, 2001). This tank has leaked, resulting in contamination of the surrounding soil (Appendix C, Photograph 26). This tank, along with the contaminated soil, is slated for removal by the NNEPA (Haven, 2012). On the west side of the building is a second, smaller AST, which contains an unknown liquid. This tank has also leaked, as evidenced by the extensive area of stained asphalt (Appendix C, Photograph 29). The antifreeze tank noted in the previous Phase I ESA was not present during the August 2012 reconnaissance.

Two additional ASTs not indicated in the previous Phase I ESA were observed east of the Particle Board Building #20 (Appendix C, Photograph 4). The tanks appeared to be empty, and



there was no evidence of staining on the surrounding concrete pad. It is not known what the tanks contained.

5.3.14 Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) may be present in fluorescent light ballasts and in electrical equipment such as transformers and capacitors. A detailed inventory of PCB-containing electrical equipment on the NFPI property was conducted in 1997 and is summarized in NSP (2001) (Appendix A). During the site visit on August 23, 2012, the following was observed with regard to electrical equipment:

- The transformer yard formerly located between Buildings #3 and #33 has been dismantled and removed (Appendix C, Photograph 32). NSP (2001) indicates that PCB-contaminated soil was removed from this location.
- Energized transformers tagged PCB non-detect were located outside of Buildings #1 and #22.
- A large untagged transformer was located on the concrete slab at the former location of Building #10 (Appendix C, Photograph 10).
- The old PCB transformer formerly located in Building #20 could not be located.
- Indoor-type transformers, typically untagged, were located in most remaining buildings and the housing of well #28.
- Fluorescent light ballasts were present throughout the site in all remaining structures.

5.3.15 Pits, Ponds, and Lagoons

The only pit observed was the soil excavation at the former AST location (Section 5.3.13).

Ponds and lagoons do not appear to be present on the subject property.



Daniel B. Stephens & Associates, Inc.

Sludge and solids separated from the process water within the power plant were sent to evaporation pits located southwest of Building #14 for drying and removal of residual sludge. A dry well was located inside Building #14 and used for drying of precipitate slurry derived from treatment of process water. An outdoor sump, presumably located near Building #14 but not evident during site reconnaissance, was the final holding facility for process water effluent from the powerhouse, which was combined with other site-derived wastewater before conveyance to the drainage system (NSP, 2001). The locations of these facilities are not described in detail in the available documentation and were not evident during site reconnaissance. Concerns related to the drainage system are addressed in Section 5.3.6.

Waste streams directed to these facilities contained numerous chemical additives employed to raise or lower process water pH and to encourage precipitation or dissolution of impurities. Chemicals used in these processes and potentially discharged to the exterior pits and sumps are described in detail in NSP (2001) (Appendix A). Potential RECs associated with these facilities were noted in NSP (2001), including a white powdery residue in the evaporation pits and oily, discolored water in the floor drains and interior sumps that drained to the final outdoor sump.

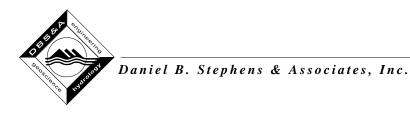
5.3.16 Stained Soil or Pavement

Stained and cracked concrete were noted throughout the site in the previous Phase I ESA (NSP, 2001). During the August 2012 site reconnaissance, heavy rain and ponding water present in building interiors and on exposed pads made determination of concrete staining difficult. DBS&A believes that the previous observations remain valid.

Concrete and soil staining were noted in association with the two leaking ASTs located on the east and west sides of Building #22 (Figure 9; Appendix C, Photographs 26 and 29).

5.3.17 Stressed Vegetation

Stressed vegetation was evident in association with the AST on the west side of Building #22.



5.3.18 Solid Waste

Numerous areas of solid waste disposal are evident across the NFPI site. Solid waste was documented on-site at numerous locations in the previous Phase I ESA report (NSP, 2001); many of these locations have been significantly modified or removed in the intervening period. The following significant observations pertaining to the current presence of solid waste on the NFPI site were noted:

- A large area of distributed debris, including metal scrap, construction materials, and cans of various shapes and sizes, is present north of the former sawmill structure (Building #10) (Figure 9).
- Assorted debris is present throughout the site, particularly in association with the
 locations of removed, damaged, or destroyed buildings. This debris may consist of
 metal scrap, machine parts, lighting fixtures, construction materials, empty drums,
 barrels, and cans of various shapes and sizes, tires and vehicle parts, and mounds of
 wood chip or sawdust.
- Large machine parts and a stack of finished particle board were present in the Particle Board Building #20.
- A burned car and other fire-related debris were present inside the Warehouse Building #13.
- Used air-sampling canisters were present in Storage Building #8, along with empty unlabeled drums and construction debris. These samplers were left over from an air sampling event conducted earlier in 2012 to assess air quality effects of the on-site fires (Manandhar, 2012).
- Several large piles of solid waste were observed at the site of the former NFPI drum yard (the boneyard) located north of Building #22. The debris appeared to be primarily construction and household waste, including wood, metal, insulation products, and aerosol and paint cans.



• Large pressurized bottles were present in several of the remaining buildings, notably Particle Board Building #20 and the Powerhouse Building #14. These bottles were labeled "Halon" and appear to have been related to the building fire suppression systems (Appendix C, Photograph 3). Discharged fire extinguisher bottles are also present in many site structures.

5.3.19 Wastewater

Wastewater is water that has been used in an industrial or manufacturing process, conveys or has conveyed sewage, or is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant. Wastewater does not include water passing through or originating at an adjacent site, such as stormwater flows, that has not been previously described.

Wastewater related to current use is limited to toilet and sink discharge, and is handled by NTUA. Stormwater is discharged to the environment from the site through the system of unlined surface ditches and subsurface hard piping (Appendix A, Figure 4-1). The integrity of the drainage piping, efficacy of off-site conveyance, and location of discharge are not known, although it can be reasonably assumed that the ultimate disposition of stormwater runoff will be the Black Creek drainage.

Numerous conditions exist that may allow contaminants to come in contact with stormwater runoff. These conditions include but may not be limited to (1) piled and distributed mixed debris that may contain hazardous substances (e.g., Appendix C, Photograph 8), (2) outside drums, barrels, and other containers that may contain potentially hazardous substances, and (3) runoff through buildings that may contain potentially hazardous substances (NSP, 2001).

Historically, NFPI generated both stormwater runoff and mixed industrial process wastewater and gray water. Stormwater was discharged to the environment. Wastewater was conveyed to the NTUA sewage lagoons. Wastewater conveyed to the NTUA lagoon was reported to be acidic and contain high concentrations of dissolved solids, as well as oil and grease. NSP (2001) documented known instances in which industrial process water was discharged directly



to the environment on the NFPI site (Appendix A). Industrial process water may also have intermingled with stormwater discharges (NSP, 2001).

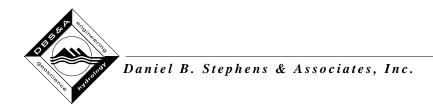
5.3.20 Wells, Septic Systems, and Pipelines

The NFPI property reportedly includes four groundwater wells (NSP, 2001), three of which (#26, #28, and #29) were located during the site visit. Well #26 appears to be equipped with a pump and plumbed, although the facility does not appear to be regularly maintained. Wells #28 and #29 are not currently equipped, and the well casings are uncovered. Well #27 could not be located and may lie off-site. No records were available of well depth or construction details (Jishie, 2012).

Drainage and water conveyance pipelines are present throughout the NFPI site. The site drainage system consists of surface trenches and underground hard piping with manhole access points (Appendix C, Photographs 5 and 6). A sketch of the drainage system showing underground pipelines is presented in NSP (2001) (Appendix A, Figure 4-1). Underground industrial process water supply and fire-suppression supply lines are present in association with current and former structures. Apparent subsurface pumping or booster stations are also present throughout the site. It is not known if these facilities served the potable or industrial water supply systems or the site drainage system. A scale diagram of the underground water conveyance system is not available.

The property does not include any known septic systems.

The property does not include any known oil or gas wells.



6. Additional Investigations

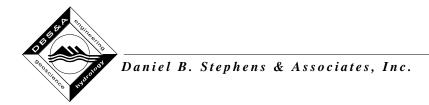
6.1 Asbestos-Containing Materials

Due to the age of the structures, asbestos-containing materials (ACMs) are likely present. Probable ACMs were noted in the previous Phase I ESA at buildings throughout the site. Probable ACMs were again observed in each of the remaining structures during the August 2012 site reconnaissance. Potential ACMs observed during the site reconnaissance include but are not limited to (1) boiler and pipe insulation in the Powerhouse Building #14, (2) fibrous sheeting between the inner wall covering and outer corrugated metal siding in Building #14 (Appendix C, Photograph 15), (3) aged and deteriorating fibrous insulation present in all observed structures, (4) electrical wire coverings, and (5) floor tiles, tile mastic, wall finishes, and ceiling tiles present in finished office spaces.

A partial ACM abatement was reported to have been conducted on the Powerhouse Building #14 (NSP, 2001). However, Richard Bitsie, Red Lake Vice President, reported that the company contracted to bag and remove the ACMs did not complete the task, leaving bagged ACMs behind within the structure (Bitsie, 2012). Subsequently, site inspection revealed large plastic bags labeled as ACM on the ground floor of Building #14, near the east entrance (Appendix C, Photograph 16).

ACMs may also be present in the numerous piles of structural debris present throughout the site, particularly at the location of the former boneyard disposal area and in the debris field north of the former Building #10.

Additional suspected ACMs that were not identified in this report may also exist within areas not accessible during the site investigation. Any unidentified suspect materials should be treated with caution until proper sampling and analysis have determined the asbestos content of those materials.



6.2 Radon

Radon is a naturally occurring, colorless, odorless gas that is a byproduct of the decay of radioactive materials potentially present in the bedrock and soil. Radon gas may enter the lowest level of a building through floor cracks, structural joints, or plumbing conduits. The U.S. EPA guidance action level for annual residential exposure to radon is 4.0 picocuries per liter (pCi/L).

According to the U.S. EPA's map of radon zones and the EDR report for the subject property (Appendix B), McKinley County is considered a Zone 2 county, which has a predicted average screening level of greater than 2 pCi/L and less than 4 pCi/L. The EDR report prepared for the subject property shows that 93 percent of radon test results are less than 4 pCi/L, with the remainder of test results falling between 4 and 20 pCi/L. Federal area radon information in the portion of the building designated by EDR as living area indicates a total average of 1.567 pCi/L (Appendix B).

6.3 Lead-Based Paint

Due to the age of the structures, lead-based paint (LBP) is likely present throughout the facility, although some LBP may be covered by newer non-LBP application in buildings that have remained in use. In unmaintained structures, LBP may not have been removed or painted over during remodeling, or may be exposed by building damage. Confirmatory samples were not collected.

The federal standard 20 CFR 1926.62 (Occupational Safety and Health Administration [OSHA] Lead in Construction Standard) regulates any detectable amount of lead in paint. If a subcontractor will be working in an area with LBP, the subcontractor must be informed in order to plan for the hazard. The OSHA standard requires the contractor to perform air monitoring for their employees during any renovation/demolition activities in which LBP is being disturbed. Additional painted surfaces that may be encountered during renovation or demolition activities must be assumed to be lead-containing until bulk sampling and analysis prove otherwise. These surfaces include but are not limited to shellacs, varnishes, and stains.



Daniel B. Stephens & Associates, Inc.

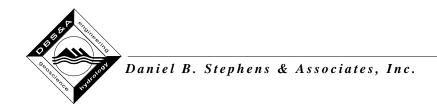
6.4 Mold

A limited visual mold screening was performed during the site inspection and identified multiple areas of moisture infiltration and potential microbial growth located throughout the remaining standing structures. Buildings #1, #3, #4, #21, #22, and #33 are currently in use and were not inspected for moisture infiltration.

Locations displaying evidence of water infiltration and water damage should be thoroughly investigated for microbial growth prior to any renovation or demolition work.

6.5 Additional User-Requested Conditions

No additional user-requested conditions are associated with this report.



7. Interviews

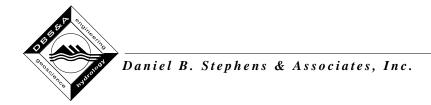
DBS&A interviewed four individuals, including a Senior Engineer from the NNEPA Superfund Program, an Industrial Development Specialist for the Navajo Division of Economic Development (DED), a geologist with NNEPA, and the Vice President of Red Lake, to obtain information regarding the potential for any RECs in connection with the NFPI property and surrounding area. The interviews conducted are listed in Table 2; interview documentation forms are provided in Appendix D. The information obtained during the interviews is summarized in Sections 7.1 through 7.4.

Table 2. Interview Summary

Date	Name	Association	Response Received/ Pending	Method of Contact
8/23/2012	Mr. Chandra Manandhar	NNEPA Superfund	Received	In person
8/23/2012	Mr. Frank Jishie	Navajo DED	Received	In person
8/23/2012	Mr. Richard Bitsie	Red Lake	Received	In person
8/24/2012	Mr. Henry Haven	NNEPA	Received	In person

7.1 Mr. Chandra Manandhar Interview

Mr. Manandhar indicated that the Air and Toxic Department of NNEPA performed air quality monitoring at the site in June 2012. This monitoring was performed at the request of residents of Navajo following a fire at the site. Mr. Manandhar identified equipment left in Storage Building #8 as air sampling apparatus, possibly left over from this recent work. However, in a follow-up interview he indicated that the equipment did not belong to NNEPA. Mr. Manandhar participated in a photoionization detector (PID) survey conducted on the subject property by the NNEPA Superfund Program the same week as the air monitoring event, with low results.



7.2 Mr. Frank Jishie Interview

Mr. Jishie provided site access and a brief general tour of the site. He indicated that several more buildings had burnt since the last ESA was performed. Mr. Jishie indicated the locations of the former ASTs and where soil excavation had been performed. He was not sure of the purpose of an apparent pumphouse between the entry gate and Building #16. Mr. Jishie indicated that Well #29 was behind Building #20 and that it was accessible. He said that there were no records for the on-site wells that indicated well construction details. Mr. Jishie was unable to locate Well #27 during a previous site inspection.

7.3 Mr. Richard Bitsie Interview

Mr. Bitsie stated that he began working at NFPI in 1968. He is now the Vice President of the Red Lake Chapter. Mr. Bitsie mentioned that a Farmington, New Mexico based company had been hired to clean out the Powerhouse Building #14. The company left after bagging some ACMs and removing some small motors. According to Mr. Bitsie, the bagged ACM was not disposed of and remains on-site.

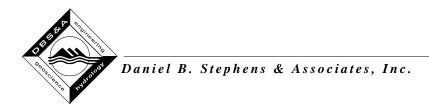
7.4 Mr. Henry Haven Interview

Mr. Haven is a geologist with NNEPA. He has worked intermittently on the NFPI property for several years, most recently to remove the eight large fuel ASTs noted in the previous Phase I ESA. He stated that when his crew arrived to remove the tanks, they were already gone. NNEPA crew then excavated an indeterminate amount of soil "saturated with diesel fuel" from the AST area. Soil samples were collected from the excavation area; however, laboratory reports were not available at the time of the interview, and were not located prior to submittal of this Phase I ESA. According to Mr. Haven, soil samples were also collected from near the fueling pumps, with low or non-detect results. Mr. Haven also provided details of planned upcoming work on the NFPI site, to entail removal of the large "used oil" AST at Building #22 (Heavy Equipment Shop), removal of contaminated soil from that location, sampling groundwater from accessible on-site wells, and abandonment of the wells following sampling.



Daniel B. Stephens & Associates, Inc.

Mr. Haven also provided information regarding the UST sites in the vicinity of NFPI. He verified the location of the abandoned Thriftway #238 and stated that the tanks were likely to have been removed "sometime in the 1990s," before he started work with the NNEPA. He was not sure if any records were available related to this site. Mr. Haven was not aware of any current or previous investigations at the Thriftway site or at the site of the current Conoco station.



8. Findings with Opinions

Based on information detailed in Sections 3 through 7, DBS&A evaluated known or suspected RECs associated with the NFPI property and nearby properties. This section summarizes the environmental professional's opinion regarding the potential impact on the NFPI property by the identified known or suspected environmental conditions.

Multiple known and potential RECs were identified at the subject property. Soil is impacted beneath the NFPI site, although the extent of the contamination is not known. Groundwater quality beneath the site has not been assessed, but may be impacted as well. Potential impacts to soil and groundwater under the NFPI site may be associated with the following RECs:

- Use, storage, and on-site disposal of potentially hazardous substances, as described in Sections 5.3.8 and 5.3.11
- Discharge of sewage and industrial wastewater to the environment through unlined drainage ditches, as described in Sections 5.3.6 and 5.3.19, and outdoor sumps and pits, as described in Section 5.3.15
- Areas of unclassified solid waste disposal present throughout the site, as described in Section 5.3.18
- Contaminated soil at the former transformer yard between Buildings #3 and #33, and other locations of electrical transformer operation, storage, or disposal, as described in NSP (2001) (Appendix A) and Section 5.3.14
- Impacted or potentially impacted soils surrounding current or former AST installations, particularly those where petroleum impacts are evident, as described in Section 5.3.13

Although potential impacts related to the identified RECs are possible throughout the site, particularly notable documented incidences of known and potential RECs are associated with the following locations:



Daniel B. Stephens & Associates, Inc.

- Particle Board Building #20 and the adjacent Millworks Buildings #5 and #15, where hazardous materials and soil impacts have been identified in previous investigations
- Drainage ditches and wastewater conveyance piping (Appendix A, Figure 4-1)
- Powerhouse Building #14 and associated pits, sumps, and cooling towers
- Warehouse Building #13 (vehicle maintenance trenches and hazardous materials noted in this and previous investigations)
- The former NFPI drum yard (the boneyard)
- Machine sumps in Particle Board Building #20Powerhouse Building #14 and the former Sawmill Building #10
- The former AST excavation site and associated fuel lines and fueling station
- Heavy Equipment Shop #22 (former vehicle maintenance trenches and leaking ASTs)
- Former transformer yard between Buildings #3 and #33

Two sites with known or suspected RECs were identified near the NFPI property (Figure 10; Table 3). Based on a review of regulatory files related to these sites, as well as observations made during site reconnaissance, DBS&A reached the conclusions discussed in the following paragraphs.

Table 3. Findings Regarding Recognized Environmental Conditions and Potential Impact to the NFPI Property, Navajo, New Mexico

Site Name	Approximate Distance from Site (feet)	Address	RECs	PI
Sandia Oil Navajo Conoco	150 (southwest)	Indian Service Route 12 and Shepard Spring Blvd	Х	Х
Thriftway #238	620 (northwest)	Indian Service Route 12	Х	Х

REC = Known or potential recognized environmental condition

PI = Potential impact to the subject property

Sandia Oil Navajo Conoco is located on the south corner of Indian Service Route 12 and Shepard Spring Boulevard. According to EDR (2012), this site is listed as an Indian UST site.



Daniel B. Stephens & Associates, Inc.

No releases have been reported from this site; however, the site has apparently been a filling station since at least the mid-1980s. The site lies at approximately the same elevation as the subject property, and the presumed flow direction of shallow groundwater at this location is to the north, toward the subject property. This site has potential RECs, and it is DBS&A's opinion that this facility represents a potential impact to the subject property.

The former Thriftway #238 filling station was located approximately 750 feet northwest of the subject property (Figure 10), and is identified in the EDR report as an Indian UST site. The site has been abandoned for at least 11 years (NSP, 2001) and has apparently been converted to a residence. Although no releases are known to have occurred from this site, no records are available documenting the tank removal or environmental status of the site. The site lies downhill and presumably downgradient of the subject property; however, little is known of the hydrologic conditions in the area. This site has potential RECs, and it is DBS&A's opinion that this facility represents a potential impact to the subject property.

Additional investigations performed during the site inspection identified the following business environmental risks (BERs) in association with the subject property:

- Due to the age of the structures, ACMs are likely to be present. Probable ACMs were noted in the previous Phase I ESA at buildings throughout the site. A limited visual asbestos survey was conducted during the site reconnaissance in August 2012, and identified probable ACMs in each of the remaining structures. Prior to the demolition or renovation of the subject property building, DBS&A recommends that suspected ACMs be considered asbestos-containing and treated as such unless and until appropriate sampling and analysis have determined the asbestos content.
- A limited visual LBP survey was conducted during the site inspection and identified numerous suspect painted surfaces throughout the site. Prior to the demolition or renovation of the painted surfaces, DBS&A recommends that all painted surfaces be assumed lead-containing unless bulk sampling and analysis have determined otherwise.



Daniel B. Stephens & Associates, Inc.

• A limited visual mold screening was performed during the site inspection and identified multiple areas of moisture infiltration and potential microbial growth. DBS&A recommends that a microbial screening be performed prior to the demolition or renovation of the subject property buildings to determine what levels of protection are required by personnel working within the area.



Daniel B. Stephens & Associates, Inc.

9. Data Gaps

A data gap is only significant if other information and/or professional experience raises reasonable concerns involving the data gap. The lack of available historical records for the subject property and surrounding properties, particularly for nearby gasoline filling stations, constitutes a data gap that affected DBS&A's ability to identify potential RECs.

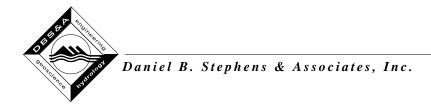


10. Conclusions

An REC is defined by ASTM E 1527-05 as the presence or likely presence of hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with the laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

DBS&A performed an updated Phase I ESA in conformance with the scope and limitations of ASTM E 1527-05 for the subject property located at the corner of Indian Service Route 12 and Shepard Spring Boulevard in Navajo, New Mexico. Exceptions to or deletions from this practice are described in Section 1 of this report.

This assessment resulted in the identification of numerous RECs on the subject property, as well as nearby properties, as outlined in Section 7 of this report. Several of these RECs are known to impact the subject property, although the extent of the impact is not known. DBS&A recommends that a Phase II investigation be conducted at the subject property to determine the extent of impacts from these on- and off-site RECs at the subject property. The Phase II ESA will most likely involve, at a minimum, collection of soil (surface and subsurface) and groundwater samples to determine the nature and extent of impacts generated by the identified RECs.



11. Deviations

11.1 Scope of Services

There were no significant deletions or deviations from the ASTM E 1527-05 scope of services.

11.2 Client Constraints

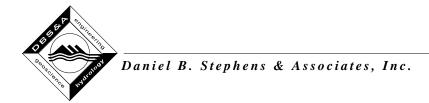
There were no client- and/or user-imposed constraints for this assessment.



Daniel B. Stephens & Associates, Inc.

12. Qualifications

The statement of qualifications of the environmental professional responsible for the updated Phase I ESA is provided in Appendix E.



13. Environmental Professional Statement

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professional as defined in §312.10 of 40 CFR 312.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Jason Raucci
Project Geologist
Daniel B. Stephens & Associates, Inc.
6020 Academy NE, Suite 100
Albuquerque, New Mexico 87109
(505) 822-9400
jraucci@dbstephens.com

John R. Bunch, PG Senior Geologist

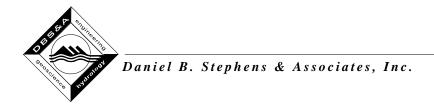
Daniel B. Stephens & Associates, Inc.

6020 Academy NE, Suite 100

Albuquerque, New Mexico 87109

(505) 822-9400

jbunch@dbstephens.com



References

- Akers, J.P., N.E. McClymonds, and J.W. Harshbarger. 1962. *Geology and ground water of the Red Lake area Navajo Indian reservation, Arizona and New Mexico.* Prepared in cooperation with the Navajo Tribe. U.S. Geological Survey (USGS) Water-Supply Paper 1576-B.
- American Society for Testing and Materials (ASTM). 2005. Standard E1527: Standard practice for environmental site assessments: Phase I environmental site assessment process. ASTM International, West Conshohocken, Pennsylvania. DOI: 10.1520/E1527-05.
- Bitsie, R. 2012. Personal communication between Richard Bitsie, Red Lake #18 Chapter of the Navajo Nation, and Jason Raucci, Daniel B. Stephens & Associates, Inc. (DBS&A). August 23, 2012.
- Daniel B. Stephens & Associates, Inc. (DBS&A). 2012. Scope of services and cost estimate for a Phase I environmental site assessment of the former Navajo Forest Products Industries Site, Navajo, New Mexico. Prepared for the Northwest New Mexico Council of Governments. July 16, 2012.
- Environmental Data Resources, Inc. (EDR). 2012. The EDR Radius Map[™] report with Geocheck[®], NFPI and Red Lake Rec. Center, Navajo Route 12 / Cleveland Blvd, Navajo, NM 87328, Inquiry number: 3380164.2s. August 2, 2012.
- Haven, H. 2012. Personal communication between Henry Haven, Navajo Nation Environmental Protection Agency (NNEPA) Leaking Underground Storage Tank Department, and Jason Raucci, DBS&A. August 23, 2012.
- Jishie, F. 2012. Personal communication between Frank Jishie, Navajo Division of Economic Development, and Jason Raucci, DBS&A. August 23, 2012.



Daniel B. Stephens & Associates, Inc.

Manandhar, C. 2012. Personal communication between Chandra Manandhar, NNEPA, and Jason Raucci, DBS&A. August 23, 2012.

Navajo Superfund Program (NSP). 2001. Phase I environmental site assessment report, Brownfields Economic Redevelopment Initiative, Navajo Forest Products Industries site, Red Lake Chapter, Navajo Nation, Navajo, McKinley County, New Mexico. Prepared by the Waste Regulatory and Compliance Dept., NNEPA, Window Rock, Arizona. September 28, 2001.

Thaden, R.E. 1990. Geologic map of the Buell Park quadrangle, Apache County, Arizona and McKinley County, New Mexico. USGS Geologic Quadrangle Map GQ-1649. Scale 1:24000.

Appendix A
2001 Phase I ESA

Phase I Environmental Site Assessment Report Brownfields Economic Redevelopment Initiative

Navajo Forest Products Industries Site

Red Lake Chapter, Navajo Nation Navajo, McKinley County, New Mexico

Prepared by:

Navajo Superfund Program
Waste Regulatory and Compliance Dept.
Navajo Nation Environmental Protection Agency
Post Office Box 2946
Window Rock, Arizona 86515

Submitted to:

Mr. Jeffery S. Inglis
U.S. EPA Region IX Superfund Project Manager
Site Assessment & Planning Section
San Francisco, California
Telephone: (415) 744-2348

and

Mr. Steven H. Simanonok U.S. EPA Region IX Brownfields Technical Consultant San Francisco, California Telephone: (415) 744-2358

September 28, 2001

TABLE OF CONTENTS

Sl	ECTIO	<u>ON</u>	PAGE
	1.0	EXECUTIVE SUMMARY	1
	2.0	PURPOSE AND SCOPE OF WORK	3
	3.0	CURRENT SITE CONDITIONS	3
	3.1	Site Location	3
	3.2	Current Land Use	3
	3.3	NFPI Buildings	7
	3.4	Utilities	
	3.5	NFPI/Community Open Dump	8
	4.0	PHYSICAL SITE CONDITIONS	8
	4.1	Topography/Elevation/Drainage	8
	4.2	Hydrogeology	
	4.3	Aerial Photograph	
	4.4	Surrounding Area	13
	5.0	SITE OWNERSHIP AND HISTORY	15
	6.0	REGULATORY RECORDS REVIEW	
	6.1	Federal	
		6.1.1 CERCLA	
		6.1.2 RCRA	
		6.1.3 SARA	
	6.2	Navajo Nation	17
	7.0	SITE EVALUATION	
	7.1	Asbestos	
	7.2	Electrical Transformers/PCBs and Other Electrical Equipment	
	7.3	Radiological Sources	
	7.4	Hazardous Material Storage Areas	
	7.5	Addendum to the Site Inventory	
	7.6	Waste Indicators	
	7.7	Subsurface Sumps or Clarifiers	
	7.8	Wastewater Drainage Systems	26
	7.9	Wastewater/Effluent Discharges	
	7.10 7.11	Above Ground Storage Tanks	
	7.11	Sensitive Receptors	31
	1.14	NET FIZURID SILC) [

LIST OF ILLUSTRATIONS

<u>FIGURE</u>				
3-1	Site Location	. 5		
3-2	NFPI Building Locations	. 6		
3-3	Groundwater Well Locations	. 10		
4-1	Site Surface Drainages	. 11		
4-2	Aerial Photograph	. 12		
4-3	Buell Park Quadrangle	. 14		
7-1	NFPI Aboveground Storage Tanks	. 30		
<u>APPENDICE</u>				
A	Reference List			
В	American Society for Testing and Material Standards			
C	NFPI Site Building Contents Inventory			
D	List of Containers with Unknown Content			

WTI Wastewater Composite Sampling Results

E

1.0 EXECUTIVE SUMMARY

The Navajo Forest Products Industries (NFPI) is located along Navajo Route 12 / Cleveland Boulevard in the community of Navajo, McKinley County, New Mexico. This environmental assessment report addresses both the NFPI site that consists of 103.28 acres with thirty-one buildings and a 45-acre dump located approximately one-half mile northeast of NFPI. Both are situated in a rural area with nearby agricultural, business, and residential areas.

In 1958, the Navajo Nation started NFPI to manufacture lumber products. Over the decades, the NFPI site was eventually expanded to include a particleboard factory, and millworks with machinery support and maintenance shops. From 1983 to 1991, Ponderosa Products, Inc. (PPI) operated an on-site particleboard plant that was leased from NFPI. In 1992, the Navajo Nation Ten-year Forest Management Plan expired, causing the logging operations to cease until a new plan was developed. To continue operations, NFPI bought timber from off-reservation sources, however, it became too costly and the facility closed in April 1995. In association with its sawmill operations, NFPI utilized a nearby dumpsite as a disposal area for wastes generated from the sawmill and particle board activities.

Over the years of operation, from 1958 to 1995, the NFPI site grew and became a large generator of hazardous waste. However, NFPI never filed a United States Environmental Protection Agency (EPA) notification of hazardous waste activity and never received an EPA identification number. In addition, the PPI's facility stored hazardous wastes and waste oil during its years of operation. The EPA and Navajo Nation Environmental Protection Agency (NNEPA) have responded numerous times to hazardous substances and hazardous wastes at the NFPI site.

The site operations used a variety of saws, adhesives, and hydraulic presses and "finger jointing" of fragmented wood with adhesives to produce lumber products. In support of these activities NFPI operated a machine shop, electric shop, heavy equipment shop, two cooling towers, and an electric power-generating building.

The following recommendations are made for the NFPI site:

- A complete asbestos-containing materials (ACM) survey with sampling of the NFPI site should be conducted, prior to the sale or leasing of buildings. Inclusion of ACM removal as the first requirement prior to use of the lease would be an option. Friable ACMs are to be removed. Other ACM types can be encapsulated or contained followed by required periodic inspections and reporting.
- The untested electric transformers without Polychlorinated Biphenyls (PCB) certificates should be tested and handled according to the PCB classification. The required reporting and record keeping are to be performed. The statuses of the PCB-energized transformers are to be checked. Fluorescent light bulbs are to be treated similarly.
- The balance of the NFPI buildings should be surveyed for radioactive sources prior to leasing or sale of any buildings.
- Screening for chlorinated compounds should be performed in the vehicle change-out pits prior to steam-cleaning and vacuum truck disposal. Unused motor oil is to be used and

- spent oil is to be properly disposed of or recycled. Other unused products should be recycled or disposed of properly.
- Regarding the Power House, Mercury and Sulfuric Acid are to be disposed of by a certified waste disposal contractor. The unknown contents of two 55-gallon drums located on the second floor should be sampled and characterized prior to disposal. The material safety data sheets should be stored and readily available in the Power House with a second set of copies stored in another building.
- The former outside waste storage areas should be tested and any contaminated soil be removed and disposed of properly.
- An effective Oversight Policy is needed to guide the Navajo Nation's management requirements of Brownfields' sites. The outside areas of the Heavy Equipment Shop #22, Power House #14, Millworks #15/#5, and Particle Board Building #20 should be sampled. The Muriatic Acid drums, relocated Sulfuric Acid drum, and car batteries need to be removed and disposed of properly.
- The unknown substances are to be characterized through sampling and testing prior to correct disposal. See Appendix D for the comprehensive list of containers with unknown contents. These wastes and solid waste should be properly disposed of prior to leasing or sale of buildings. An inventory to check on chemicals left in Warehouse #21 prior to Nations Oil & Gas, Inc.'s use of the building is needed, and the inventory report is to be put on file.
- Sludge sediment samples from Power House #14's inside sumps and evaporation pits should be characterized and its main manhole drain relocated outside.
- Sediments in the open unlined drainage trench adjacent to the Power House and Sawmill buildings should be sampled and analyzed.
- Regarding NFPI's sewage piping, a report of NFPI's repair and a Navajo Superfund Program or federal Resource Conservation and Recovery Act observation report should be sought, retrieved, noted and placed in the file. An NFPI contingency plan is needed to prevent exceedance of Navajo Tribal Utility Authority's possible local ordinances, which may prevent overloading of the sewage lagoons.
- Regarding the aboveground storage tanks, empty the fuel tanks according to approved guidelines, and test the area after removal of stained soil.
- Sediment samples from the Tohdildonih Wash and Black Creek should be collected and analyzed to complete a prior assessment.
- Sediment samples should be collected and analyzed from the dumpsite's adjoining tributaries that feed into the Tohdildonih Wash. Confirmation of Dichlorobenzene at the dumpsite should simultaneously be performed. Reuse of the wood scrap/sawdust and thereafter reclamation of the dumpsite should be explored to remove the liability issue potentially associated with unlawful entries by local residences.

2.0 PURPOSE AND SCOPE OF WORK

The purpose of this environmental site assessment is to determine whether hazardous substances or wastes have potentially contaminated the NFPI site, off-site parcels and/or the waste disposal (dumpsite) area. The Navajo Superfund Program (NSP) staff conducted a buildings content inventory at the site in June, July and September 1997. Concurrently, the Brownfields project staff conducted community relations activities.

The NSP staff investigated the current environmental site conditions and evaluated the potential for hazardous substances to contaminate the site. This report focuses on past site operations, existing site conditions, and properties within a specific distance from the site. This report was performed, to the extent possible, in accordance with the American Society for Testing and Materials (ASTM) standards. See Appendix B for the ASTM standards for this report. The Scope of Work for this report included the following activities that were conducted by NSP and Brownfields staff:

- Review of historical, regulatory program and agency records;
- Interviews with persons knowledgeable of past practices at the site;
- Site visits for assessment of current conditions, including the inventory of abandoned products and wastes;
- Off-site reconnaissance of parcels adjacent to and within a one-quarter mile radius of the site as well as parcels impacted by alleged disposal of used chemicals, and;
- Preparation of this Phase I Environmental Site Assessment report.

Historical information on the NFPI site operations was either difficult to locate or non-existent. Records were not always available for the site utilities, specific chemicals used, disposal methods for spent chemicals, and the previous abatement of ACMs for certain on-site buildings. A site map of the property was developed based on information provided by former NFPI employees.

3.0 CURRENT SITE CONDITIONS

3.1 Site Location

The NFPI site is located alongside Navajo Route 12/Cleveland Boulevard in the community of Navajo, McKinley County, New Mexico. The site consists of approximately 103.28-acre main facility with a 45-acre dump located one-half mile to the northeast. The geographical coordinates of the site are Latitude 35°54'45"North, Longitude 109°11'11"West, (Township 19 North, Range 21 West, Section Unsurveyed, Gila and Salt River Meridian, Buell Park, AZ-NM 7.5-minute quadrangle). (1) The location of the site is shown in Figure 3-1.

3.2 Current Land Use

Staff from the Red Lake Chapter (RLC), Navajo Nation Property Management Department (Navajo PMD), Nations Oil & Gas, Inc. (NO&G), Terranova Forest Products, Inc. (TFP), and the Navajo Townsite Community Development Corporation (NTCDC) currently utilize four NFPI buildings. The RLC, NO&G, and TFP have offices in portions of the Administration

building #1. The NO&G and NTCDC utilize Storage building #21 and Building #3, respectively. The Navajo PMD personnel who provide 24-hour security occupy the Guard House #2. The Navajo PMD staff indicated that the remaining buildings are vacant (2). See Figure 3-2 for NFPI building locations.

Figure 3-1 Site Location

Navajo Forest Products Industries (NFPI) Site Navajo, McKinley Co., New Mexico TDD: T09-9108-0002 PAN: E09Z076-SA Ecology & Environment, Inc.

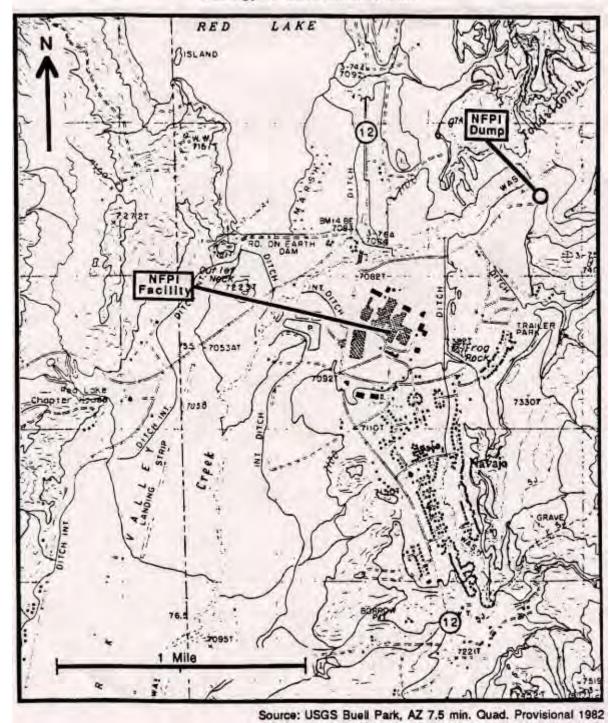
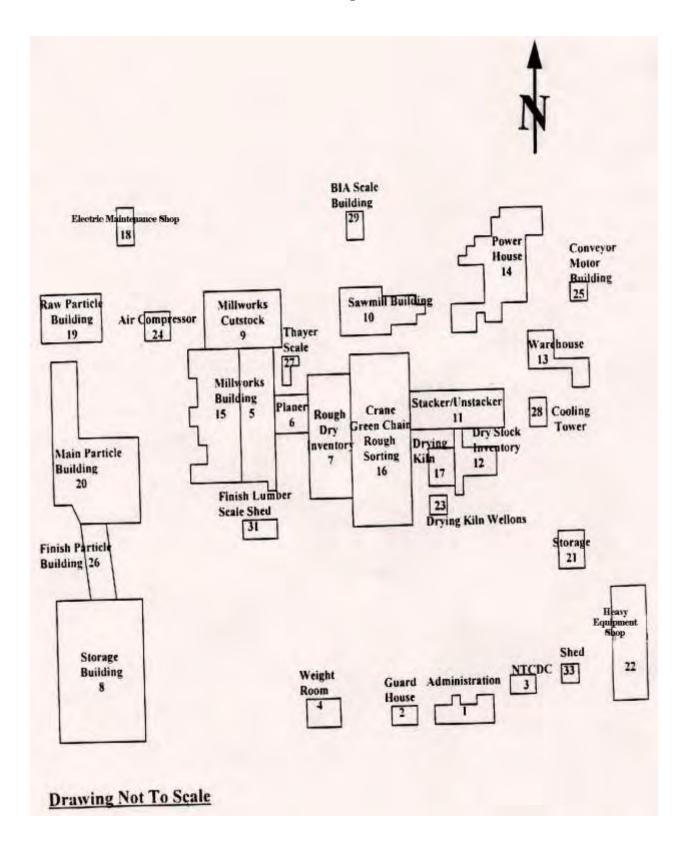


Figure 3-2 NFPI Building Locations



In February 1998, the Navajo Nation approved a business lease for Millennial Homes, Inc. (MHI) to establish a residential housing and commercial buildings manufacturing operation in storage building #8. Between February 1998 and January 1999, the MHI employed 25 individuals who constructed two modular homes and one partial home. During their occupancy, it was reported by the Navajo PMD security guards that MHI personnel had inventoried several NFPI buildings for retrofitting materials and removed equipment and structure materials for its assembly-line construction operations in Storage building #8. The MHI also utilized the Heavy Equipment building #22, although their lease specified their operations be confined to the Storage building #8. In January 1999, the MHI ceased its operations at the NFPI site. (2)

3.3 NFPI Buildings

The site contains 31 buildings that occupy 714,971 square feet. See Figure 3-2 for the NFPI building locations. See Appendix C for the buildings' contents as listed on the inventory sheet.

On June 7, 1999, Pacific Western Machinery, Inc. (PWM) contacted staff to relay that it was acting as an intermediary to a Chilean business who was purchasing selected NFPI building support structures, metal skins and logging equipment. The assets purchased (but not the buildings) are from the Heavy Equipment shop #22, Warehouse #13, Air Compressor #24 and Cooling Tower #28. The assets and buildings purchased are the following buildings: Dry Kiln



#17, Sawmill #10, Green Chain/Rough Sorting #16, Planar #6, Electric Maintenance building #18, Millworks Cutstock #9, and Millworks #15/#5. Subsequently, PWM subcontracted TFP to carry out the inventory and packaging of purchased assets, structure dismantling activities, and arranging of its transport off-site.

On July 20, 2000, a large fire burned the Millworks Cutstock #9 and Millworks building #15, and damaged the west and north sides of Millworks building #5. These metal buildings have since been dismantled and its salvageable components sold for scrap.

In April 2001, TFP dismantled the purchased Electric Maintenance Shop #18 and along with its contents had it transported off-site. Also in the same month, the purchased contents of the Air Compressor #24 were removed and taken off-site.

On August 1999, staff met with the Chilean representative to determine which buildings will be dismantled and to discuss the environmental assessment of the buildings purchased. Western Technologies, Inc. was selected by TFP to conduct an environmental assessment of the buildings before they were dismantled, however the assessment was not completed. NSP staff was informed the buildings will be removed within the year and a report forwarded to the NSP.

3.4 Utilities

NFPI utilized water from the Buell Park water well located several miles west of the NFPI site for site operations. The water pumped from Buell Park was stored in the water tower located in the northwest area of the site. NFPI continued to pump water from Buell Park until the NTUA water connection in 1970. Since then, the NFPI site employees used the NTUA water, while the four on-site shallow groundwater wells and the two water wells adjacent to the site were used for site operations. The site has freestanding fire hydrants and sprinkler houses throughout the site. (3) See Figure 3-3 for locations of groundwater wells.

3.5 NFPI/Community Open Dump

The NFPI open dump is located one-half mile northeast of the site and south of Tribal Route 31 (dirt road) against a sandstone ridge. The approximate 45-acre dumpsite is bordered by two surface drainages that flow north and empty into the Tohdildonih Wash. The Tohdildonih Wash feeds into Black Creek south of Red Lake and continues to flow southwest. The dumpsite was initially established by NFPI for disposal of its operational waste; however, the community of Navajo made use of it shortly thereafter. Due to complaints from local residents, the NFPI dumpsite was permanently closed (fenced off) in June 1990. Local residents however continued to illegally dump their trash in the accessible areas. (4)

4.0 PHYSICAL SITE CONDITIONS

4.1 Topography/Elevation/Drainage

According to the U. S. Geological Survey 7.5-Minute topographic map, the NFPI site is at an elevation of approximately 7,100 feet above mean sea level. Using unlined trenches or ditches, two main surface drainages channeled storm water towards the west where they converged and drained off-site. Several drainages from the site buildings emptied into the main drainages. See Figure 4-1 for the site surface drainages.

4.2 Hydrogeology

The Entrada Sandstone provides the groundwater for the site wells and is recharged by surface water infiltration from Tohdildonih Wash, which courses on the north side of the site. The infiltration from seasonal run-off restores the groundwater supply for the four on-site wells. The groundwater or alluvial aquifer is encountered at approximately fifty-five feet below ground surface. Underlying the site area is unconsolidated alluvial and eolian deposits of silt, sand, and gravel, which are underlain by siltstone, and silty sandstone of the Chinle Formation. (3, 4)

NFPI site operations had used four on-site ground water wells for industrial and fire suppression purposes. The community water wells are located approximately three miles west of the site in a different aquifer. Approximately two miles downstream from the site, there is a shallow well source that draws from the alluvial aquifer and is used for watering of livestock, with possible human consumption. (3, 4)

4.3 Aerial Photograph

An aerial photograph of the NFPI site dated June 7, 1991 was obtained from the EPA Region IX. The 1991 photograph is at 1"= 260' scale. Visible in the photograph is the NFPI site buildings, north of the site is the log yard, and northeast of the site is the wood wastes. Portions of the west area of the NFPI dumpsite are visible. See Figure 4-2 for the aerial photograph of the NFPI site.

Figure 3-3 Groundwater Well Locations

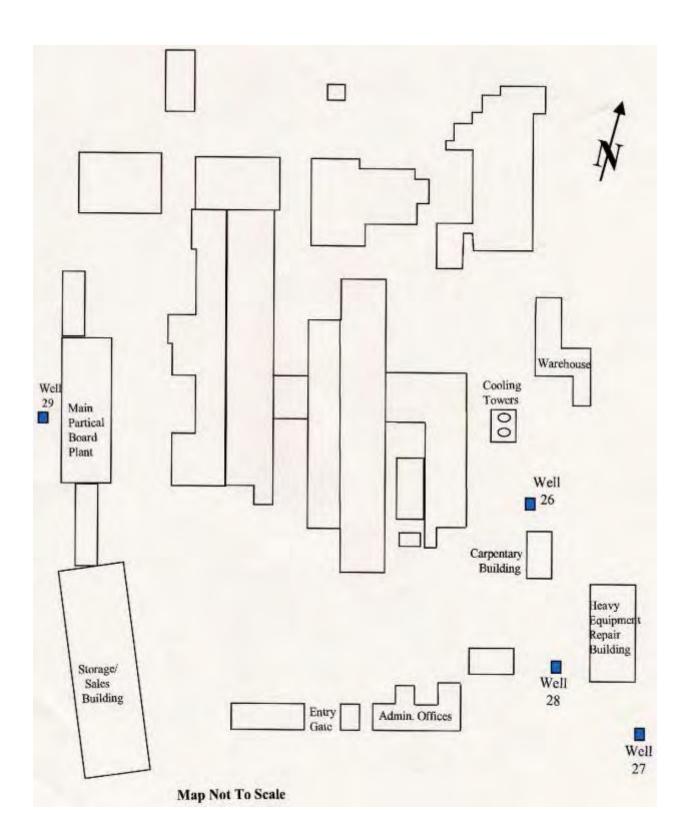


Figure 4-1 Site Surface Drainages

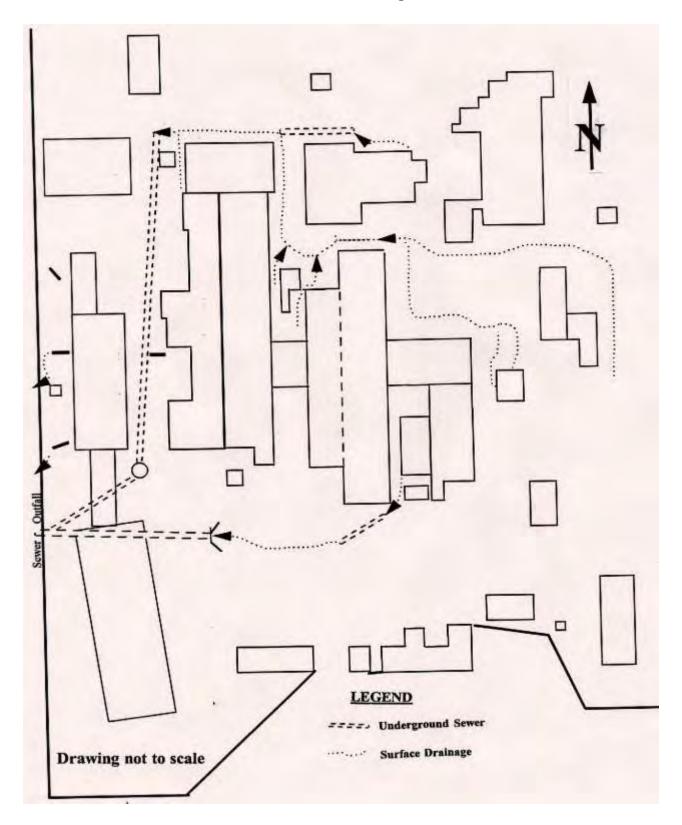
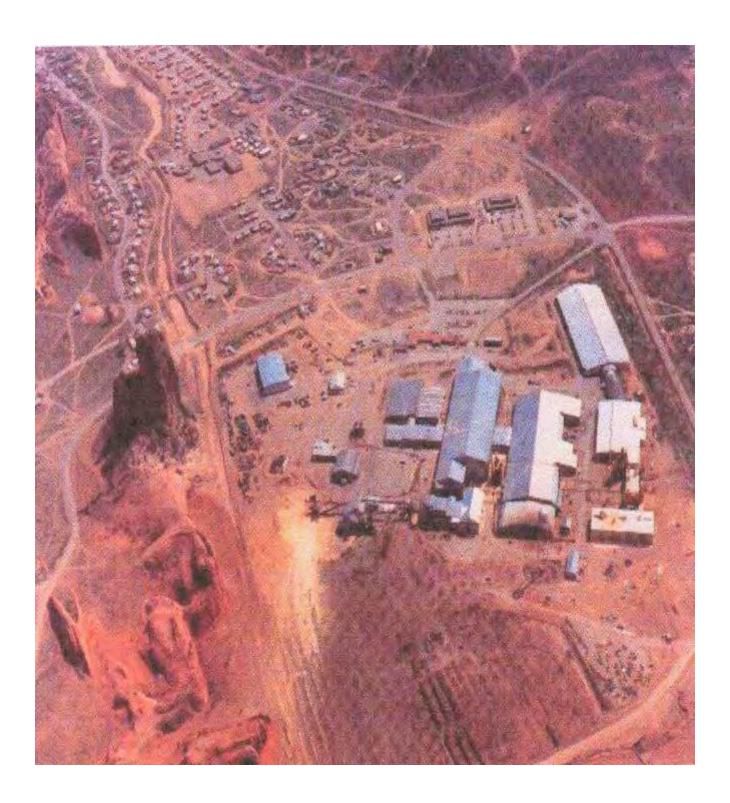


Figure 4-2 Aerial Photograph



4.4 Surrounding Area

The American Indian Resident Population by Chapter in the 1990 Census reported 2,293 residents in Red Lake Chapter. (5) See Figure 4-3 for topographic 7.5-minute quadrangle map of Buell Park.

Brownfields staff performed an off-site reconnaissance in August 1997 and February 1998. The reconnaissance consisted of a survey of adjacent properties and properties within one-quarter mile radius of the site. A visual assessment of land and property uses was conducted and included contacts with the NTCDC. The properties surrounding the site are commercial, residential, schools, and agricultural areas. The following provides properties located adjacent to the site (1,2,5):

Properties Located East of the site:

Navajo Trailer Court Navajo Housing Authority residential housing Navajo Baptist Church

Properties Located South and Southwest of the site:

Black Creek Wash
Softball field, Basketball court, and Community Park,
NTCDC office is on-site, NFPI Guest house,
NTCDC residential housing and Trailer Court,
Navajo Communications Company,
James Begay Chain Saw Shop,
Navajo Fire Department/Navajo Detention Center,
Navajo Recreation Center,
Ft. Defiance Indian Health Service Dental Clinic,
Elite Laundry, General Store, Navajo Pine Market, the Fina Gas Station, and the
Navajo High School, Pre-Schools, and Churches.

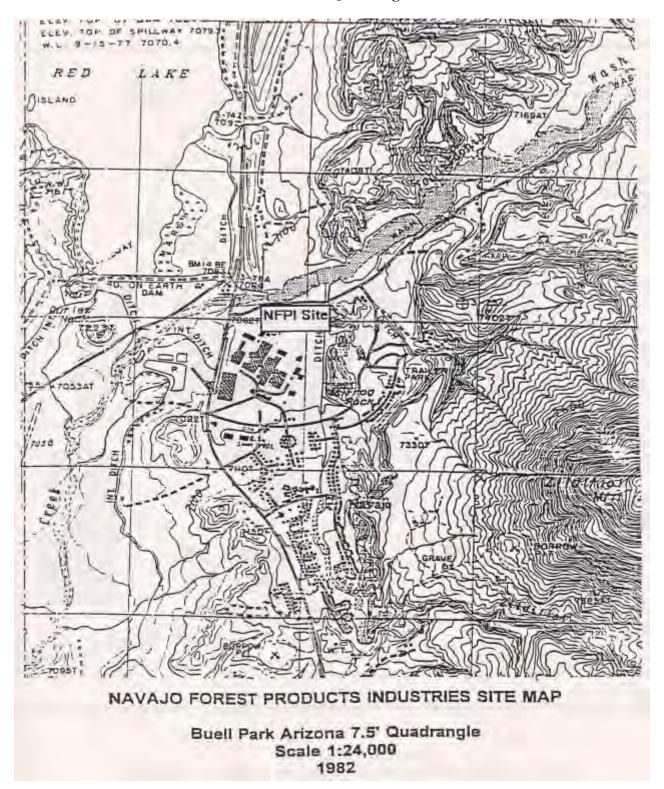
Properties Located West of the site:

Abandoned Thriftway Store, NTUA sewage lagoon.

Properties Located North and Northwest of the site:

Tohdildonih Wash, Red Lake, a recreational water body with sensitive animal species, Residential areas, Agricultural fields.

Figure 4-3 Buell Park Quadrangle



Future development proposed for the community of Navajo is a low-income apartment unit located at the east corner of Highway 12 and Walnut Avenue. Approximately forty low-income apartment units are financed under the Low-Income Housing Tax Credit Program administered by the New Mexico Mortgage Finance Authority. The project will contain six two-story buildings with one, two, and three bedroom units. Amenities will include a community building, laundry facilities, and washer/dryer hookups in the larger units and a playground.

5.0 SITE OWNERSHIP AND HISTORY

In 1958, the Navajo Nation started NFPI to utilize the tribal timber resources that employed mostly Navajo people. The Navajo Nation council withdrew the area for the NFPI operation in November 1960. The U. S. Federal Government under the authority of the Department of the Interior's Bureau of Indian Affairs (BIA) holds the land in trust for the Navajo Nation. (3, 4)

NFPI began sawmill operations in 1962 and employed over 300 local residents. Over the years, the mill site expanded to include the particleboard factory, maintenance shops, and millworks building. From 1958 to 1988, the facility milled an average of 40 million board feet of lumber with annual sales exceeding \$20 million. The benefits of this operation to the Navajo Nation were it provided on-reservation employment and a steady source of income for the tribal General Funds account. (3,4,5)

In 1983, PPI leased from NFPI the particleboard plant, which used sawdust and wood chips to fabricate particleboards, until PPI closed in 1991. During this period, portions of the NFPI site were used to store hazardous wastes, solid waste, waste oil and parts. (4,6)

In association with its sawmill operations, NFPI maintained an off-site dump that was used for the disposal of waste wood debris and other solid waste generated by site operations. The NSP staff investigated potential environmental impacts and releases of hazardous chemicals/wastes at the dumpsite. The Superfund Preliminary Assessment (PA) reported extensive dumping of sawdust, wood scraps, metal scraps, domestic wastes, and wastes from particleboard processing, which used formaldehyde. The EPA Region VI determined no further action would be taken on the NFPI dumpsite. (4)

In 1992, the Navajo Nation Ten-year Forest Management Plan (FMP) expired. The BIA Navajo Area Office determined logging could not continue under an expired FMP. A new Ten-year FMP had to be developed before anymore on-reservation logging could continue. To continue operating, NFPI had to buy timber from off-reservation sources. This timber was purchased from the national forest and private land sales, but this source was too costly to sustain. From April 1993 to March 1994, NFPI's income fell to \$16 million and total wages dropped to \$4.5 million. In April 1995, remaining employees were laid off and the facility went on a temporary shutdown, until a cost-effective time source could be identified.

6.0 REGULATORY RECORDS REVIEW

Information in this section is based on the specific references contained within each subsection. Sources of information may include commercially available and proprietary regulatory database, regulatory agency files, personal interviews and telephone interviews.

6.1 Federal

The EPA Region IX Superfund Division provided regulatory records, compliance information, and past site investigations on the NFPI site.

The BIA Environmental Quality and Realty offices were contacted in search of the legal description, ownership, and leasing information on the NFPI site.

6.1.1 Comprehensive Environmental Response, Compensation & Liability Act (CERCLA)

Due to inspection reports from the federal Resource Conservation Recovery Act office, the NSP entered the site into the federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database on June 21, 1991; subsequently, the site was assigned the EPA identification #NND041360462.

Under the CERCLA, also known as Superfund, the NSP conducted a PA process of the site in July 1991. The PA was done due to contamination from corrosive material in the drum yard and the potential contaminant migration in the surface water pathway. (3)

6.1.2 Resource Conservation and Recovery Act (RCRA)

During a joint site inspection by NNEPA Resource Conservation and Recovery Program (Navajo RCR) and the EPA Region IX RCRA in March 1991, staff observed eighty-eight abandoned 55-gallon drums of hazardous waste in the NFPI drum yard, also known as "the bone yard." It was determined that the NFPI had operated as a hazardous waste generator for many years without filing an EPA notification of hazardous waste activity or without an EPA identification number. Eventually, the drum contents in the bone yard were sampled, characterized, separated into groups, and manifested off-site by Perma-Fix Environmental Services, Inc. by December 1993. The empty drums were reconditioned and the unserviceable empty drums were scraped for metal recovery. (3,6,7)

In October 1995, Navajo RCR based on the presence of potentially hazardous substances discovered in April 1995 referred the site to NSP again. The EPA on-site visit in September 1995 revealed bags and barrels exposed to weather, which eventually breached and caused a release of hazardous substances.

6.1.3 Superfund Amendments and Reauthorization Act (SARA)

The Emergency Planning and Community Right-to-know Act of 1986 (also known as SARA Title III) apply to facilities with chemical inventories. If the facility is required under the federal Occupational Safety and Health Administration to prepare or have available material safety data sheets (MSDS), then copies of the MSDS, or their information, is required to be provided to the local fire departments, the Navajo Nation Commission on Emergency Management, and any appropriate local emergency planning groups. The MSDS explains the chemical properties of a substance, effects on human health, and treating potential victims exposed to the chemical.

The Brownfields staff obtained information on those chemicals without MSDS sheets through chemical suppliers and chemical lists provided by former NFPI employees. Some MSDS information was available through past reports completed by EPA Region IX and Navajo RCR.

6.2 Navajo Nation

The Brownfields staff contacted individuals within the agencies of the Navajo Nation to obtain information on the site utilities, site building descriptions, the legal description, and ownership of the site. The Brownfields Specialist attended several meetings, conducted interviews, and contacted numerous individuals associated with the site to collect background information. The NNEPA Asbestos Program, the Navajo Nation Design & Engineering Dept. and NTUA had no information on the site. The site maintained maps and records of the site; however, these records were not available during the site inventory. The Navajo Nation agencies that provided information on the site were NSP, Navajo RCR, NNEPA Pollution Discharge Elimination Systems Program, and the NNEPA Underground Storage Tanks Program. The Navajo PMD and Navajo Nation Water Resources Department provided additional information on the site utilities and groundwater.

The Navajo PMD security guards and former NFPI employees provided verbal records of past site operations, building descriptions, and uses. No site blue prints of the buildings, electrical wirings, wastewater systems, and drainage areas were available. (2,3,4)

7.0 SITE EVALUATION

The information contained in this section is based upon the regulatory record reviews, interviews with former site personnel, and the site inventory performed by NSP staff conducted on June 29-24, 1997, August 26-29, 1997, and September 8-11, 1997. NSP staff conducted interviews with former NFPI employees, NTCDC, Navajo PMD security employees, and former NFPI employees who provided the site's background information and operational activities for each building inventoried.

7.1 Asbestos

Prior to the late 1970s, asbestos was a common constituent in a wide variety of materials used in building construction. The ACMs were typically used in thermal insulations, acoustical ceiling spray/tiles, wallboards, non-ceramic floor coverings, and roofing materials. The NSP staff observed asbestos-like material on the pipes located in the Power House #14, the Green Chain area #16, the Dry Kiln area #17 and #23 positioned outside next to the Sawmill on the westside, and in other buildings throughout the site. (8)

The TFP performed a partial survey and removal of ACMs, which were manifested off-site on September 7, 2000.

CONCLUSION: A complete ACM survey with sampling of the NFPI site was not performed.

RECOMMENDATION: A complete ACM survey with sampling of the NFPI site should be performed and put on file prior to the sale of buildings or leasing of the site. Inclusion of ACM removal as the first requirement prior to use of the lease would be an option. Friable asbestos is to be removed. Other types of asbestos can be encapsulated or contained followed by required periodic inspections and reporting. Reports of the complete ACM survey and removal should be sent to the NSP office.

7.2 Electrical Transformers / PCB Transformers and other Electrical Equipment

PCBs are recognized as toxic substances under the federal Toxic Substances Control Act. The *PCB contaminated* and *PCB* electrical equipment has strict record-keeping and management requirements for continued use, storage, and disposal (40 CFR Part 761). Types of electrical equipment include transformers and capacitors, which are labeled *PCB contaminated* if the PCB concentration is between 50 to 500 parts per million (ppm), and *PCB* if the PCB concentration is greater than 500 ppm, whereas those labeled as *PCB free* have concentrations less than 50 ppm. Leakage from PCB equipment labeled as *PCB contaminated or PCB* would present an area of environmental concern. Required inventorying on record included the serial number, volume of silicone, total weight, sample number, and company placards if present. Inventorying was performed to determine the handling of the transformers or capacitors. Pending the above categorization, transformers or capacitors were removed and replaced, unless the PCB certificates were marked non-detect.

On May 22, 1997 representatives from the EPA Region IX Emergency Response Team (ERT),



Management at the NFPI Transformer Yard. The ERT and NSP staff conducted an inventory and identified fifty-six off-line PCB capacitors and three large energized PCB transformers that were found within the fenced NFPI Transformer Yard. This yard was located between the NTCDC building #3 and the Shed #33. The ERT field-screened some of the fifty-six off-line capacitors. All capacitors had PCB stickers and were put in

met with staff from the NNEPA and the Navajo Nation Department of Emergency

drums for storage and subsequent removal.

Within the NFPI area, the ERT further inventoried and found in-door transformers within Power House #14 labeled with a PCB certificate marked as non-detect, Stacker/Unstacker #11 labeled with a PCB certificate marked as non-detect, Planer #6 not tagged, Sawmill Building #10 as a non-PCB replacement to the former PCB transformer, and Storage Building #8 not tagged, and an out-door transformer labeled with a PCB certificate marked as non-detect, which was located between Air Compressor #24 and the Heavy Equipment Shop #22. The other transformer located outside of the Power House #14 was removed. The one out-door transformer and in-door transformers displayed no signs of leakage.

Soil samples were also collected from the NFPI Transformer Yard and oil samples from the old transformer located in Storage Building #8 by the ERT. Oil samples could not be collected from the three large energized transformers in the NFPI Transformer Yard. The soil samples were field screened for PCB resulting in a need for selected confirmation of some samples that were routed to the EPA Laboratory. The EPA laboratory results indicated a small quantity of moderately contaminated soil, at the base of the transformer located in the yard. The indication for removal of the fifty-six PCB capacitors, the three PCB transformers, and contaminated soil at the base of these transformers soil were cited in an EPA memo from Michael Feeley, EPA's Deputy Director of Superfund, directed to the attention of Bennie Cohoe, former NNEPA Executive Director. (9)

Removal of the large transformers and capacitors located within the NFPI transformer yard occurred on July 1998. (10) Prior to removal, NTUA took the three energized transformers off-line in November 1997 as recommended by EPA. (11) The NSP staff reported this event to the EPA. Thereafter, these three transformers were re-energized for RLC's use of NFPI Administration Building #1. They are currently in use.

CONCLUSIONS: The transformers discovered in the buildings remain within the NFPI site. They were not tested due to the absence of a sampling point, with the exception of Storage Building #8. A few had PCB Certificates marked as non-detect. EPA's report of data results is not on file. The change out of PCB oil in the energized transformers or replacement of the transformer is not known. Fluorescent light ballasts are present and commonly contain PCBs.

RECOMMENDATIONS: The untested transformers without PCB certificates should be tested and handled according to the PCB classification. Required reporting and record keeping are to be performed. The status of the PCB energized transformers is to be checked. Fluorescent light bulbs are to be treated similarly.

7.3 Radiological Sources

The Nuclear Regulatory Commission (NRC) regulates radiological sources and issues licenses required for the Navajo Nation to conduct radiological survey leaks.

NSP staff provided assistance to the Navajo PMD on locating three density meters with built-in radioactive sources located in Particle Board Building #20. Two of these meters contained Cesium-137 and the third one contained Americium-241. (12)

On January 23, 1997, EPA hired Thermo Nutech, Inc. as consultants to conduct a radiological survey inclusive of smear sampling on these three density meters and nearby areas. The results of the survey and sampling demonstrated radioactive materials were not found in Particle Board Building #20 and were contained within the original container. (12) Negative results of smear samples were found at the source's housing, the source's opening, and adjacent walk areas.

The radioactive sources contained in the density meters were removed and transported to the state of Oregon in 1997. The NRC license for the Navajo PMD was thereafter terminated. (13)

CONCLUSION: The PPI installed three density meters during their lease and obtained an NRC license. No annual records and updates were located. Navajo PMD who has responsibility of assets, inherited the NRC license after PPI's departure.

RECOMMENDATION: The balance of the buildings should be surveyed for radioactive sources prior to leasing of the NFPI site and sale of NFPI buildings.

7.4 Hazardous Materials Storage Areas

Hazardous materials should be stored in such a manner as to contain any potential leaks, spills or other discharges. All containers of hazardous materials should be properly labeled with accompanying MSDS stored at the site.

Past EPA and NNEPA Hazardous Waste Program reports indicate portions of the NFPI site were used to store generated hazardous wastes and waste oil since 1962. NFPI operated as a hazardous waste generator in the absence of an EPA identification number and without filing notification of hazardous waste activity. Hazardous wastes were generated at the Heavy Equipment Shop #22, Power House #14, and the Particle Board Building #20 according to an EPA RCRA Compliance Evaluation Report. Generated Hazardous Wastes as spent materials from industrial applications include Stoddard Solvent, 1,1,1-Trichloroethane, Dichlorobenzene (DCB), lubricants, solvents for cleaning vehicle parts, and anti-freeze. (14)

Heavy Equipment Shop #22. An interview with Roscoe Smith, former NFPI employee,



indicated that the Heavy Equipment Shop #22 was used to maintain the tractors and trucks using motor oil, solvents for cleaning parts, and antifreeze. The waste solvent from this shop was collected monthly and maintained in a 2000-gallon metal tank labeled "Waste Oil." The antifreeze was collected and stored in a 1500-gallon metal tank labeled "Antifreeze." Pick up occurred as needed pending capacity. Inside this shop, the vehicle change-out pits were located in

the east area of the shop and contained discolored water with free-floating products. The type of products that were drained into the change-out vehicle pits is unknown.

Warehouse #13. The machine shop, the truck shop, and the NFPI millworkers meeting room are in this building. The machine and truck shops involved mechanical repairs that primarily used caustic rust removers, resins, degreasers, paint thinners, and heavy metal-containing paints. Other generated wastes include antifreeze, brake fluid, transmission fluid, and a variety of aerosol cans. It is unknown if motor oil was recycled into unlabeled containers or disposed of in the vehicle maintenance change-out pits. It is also unknown if the residue from cleaning truck parts was disposed of into the 5-gallon metal containers or the vehicle maintenance pits. Last, an unknown black-colored viscous liquid exists in one of the truck shop's change-out pits. The interviewee could not provide information of the above unknowns.

CONCLUSIONS: It is known that the Heavy Equipment Shop #22 and the Warehouse #13 conducted mechanical repairs on vehicles and equipment using degreasing solvents, antifreeze, and motor oil. The waste motor oil was seen in the vehicle change-out pits, in 5-gallon cans, and stored improperly in other waste cans in the shops. In 1998, Safety Kleen of Farmington, New Mexico removed the solvents that were located in the Maintenance Shop.

RECOMMENDATIONS: It is recommended that screening for chlorinated compounds be performed in the vehicle change-out pits prior to steam cleaning and vacuum truck disposal. It is also recommended that the unused motor oil be reused and the spent oil be properly disposed of or recycled. Other unused products should be recycled or disposed of properly.

Power House #14. NSF Staff inventoried both the ground level and second floor of the Power



House. The ground-level floor is composed of three rooms (a boiler room, the clarifier room, and the electrical switch room) and contained various chemicals stored near the entry area as well as in the clarifier room. The entry area had stored water treatment chemicals contained in 35-gallon carboys, several 55-gallon drums with different chemicals, and 10-pound bags of finishing cement, lime mixers, and sodium mixers. The labels on some of the 55-gallon drums had indication of flammability, reactivity, and corrosivity. MSDS

sheets were not located for identification of these stored chemicals during the inventory. MSDS sheets were later obtained from distributors by NSP staff.

The second floor is composed of the Conveyor and the Turbine rooms, which contain the turbine generators, the control panel for the boilers, the hot process tanks, and the electrical switch room that controlled various NFPI site operations. The hot process initiated on the first floor and continued to the second floor before reaching the third floor's deck area. The hot process used lime to precipitate and remove Calcium and/or Magnesium hardness from the NFPI onsite water source or NTUA's purchased water source. Sodium was used to regenerate the resin filter where further softening occurred, as water removed of the majority of Calcium and/or Magnesium hardness, was directed through the regenerated resin filter. The conveyor belt in the conveyor room was used to transfer untreated sawdust, as fuel for burning in the boiler.

On the second floor, the south area of the Turbine room has a water treatment cabinet area for analyzing the hardness of water. A filled 32-ounce plastic container marked "Mercury" was found in the cabinet area. There was no MSDS sheet or other information available on the type of Mercury. It is unknown if mercury was used for water treatment analysis.

Other chemicals found were sulfuric acid and several other 55-gallon drums. MSDS sheets were found on a few drums with exception of two drums that were not labeled thus could not be associated with MSDS sheets.

CONCLUSION: Improper identification and storage were evident. Unknowns are also present creating a hazardous work environment.

RECOMMENDATION: Mercury and Sulfuric Acid are to be disposed of by a certified Waste disposal contractor. The unknown contents of two 55-gallon drums located on the second floor should be sampled and characterized prior to disposal. MSDS sheets should be stored and readily available in the Powerhouse with a second set of copies stored in another building.

Cooling Tower #28. The cooling tower process condensed steam exhaust from the boiler into water (internal process), as steam passed through the blades onto cool radiator tubes containing cool water (external process). The interviewee reported that sulfuric acid was used to keep solids dissolved by maintaining a lower pH in the water. Inhibitors were used to prevent scaling. Located were a 35-gallon chemical carboy that did not have an MSDS sheet or a label and a 55-gallon drum, which were inventoried by recordings of the material name, manufacturer's label, and material's use.

Particle Board Building #20 and Millworks Building #15/#5. The building leased to Ponderosa



Products Industries (PPI) had a particleboard operation, which utilized a urea formaldehyde resin liquid and wax emulsion. Other chemicals found in soil as reported by EPA were corrosive and combustible with the presence of dichlorobenzene (DCB) and chlorinated solvent wastes at the PPI operational area. The operation in the Millworks building #15/#5 used adhesives, adhesive resins, and acids for the finger jointing operation.

Bone Yard and Dump Site. Hazardous waste was previously stored in the NFPI drum yard, also known as bone yard, located northeast of the Heavy Equipment Shop #22. In 1991 EPA identified these drums of stored hazardous waste as containing oils with chlorine, oils with solvents, water treatment solids, grease, water and unknown liquids. Further sampling conducted by EPA identified the contents of these drums as hydrocarbons (Stoddard, Naphtha, Waste Lubricants, Hydraulic Fluids, and Glycols). EPA reported a significant portion of the drum yard materials were not RCRA-regulated items and were treated as Special Industrial Waste and disposed of by Perma-Fix of New Mexico, Inc. (PFNM) from Albuquerque, NM. (14)

The EPA report indicated other collected samples were soil samples from the bone yard that showed relatively low concentrations of metals and organic contaminants, except for DCBs. The analytical report indicated that up to 72 milligrams of 1,2-DCB per kilogram of soil was detected. Levels were slightly higher at the south end of the bone yard than at the north area. Soils collected at the NFPI dump were similarly contaminated. (14) No data from the EPA Contract Laboratory Program samples was available at the close of the EPA project. It is unknown if the tested soil which showed DCBs in contaminated soils at the dumpsite was

removed by PFNM. The bone yard stained and contaminated soils were removed by PFNM and disposed of at a permitted landfill. (14)

CONCLUSION: The extent of soil contaminated with DCBs should be identified.

RECOMMENDATION: The area should be tested and the contaminated soil should be removed and disposed of properly.

7.5 Addendum To The Site Inventory

As follow up to the site inventory conducted in 1997, NSP staff conducted another NFPI building site inventory on July 16, 1999. The site inventory was conducted to assess the current status of selected NFPI buildings for potential buyers and the existence of any potential hazardous materials that were used by the former lessee, MHI.

The Navajo Nation approved a business lease for MHI in February 1998. The lease allowed use of Storage Building #8 as a manufacturing plant of residential housings and commercial buildings. The lessee operated for one year and ceased operations on February 16, 1999. During their lease duration and without authorization, the lessee used other buildings for salvageable items to use in their production lines, relocated a variety of solvent and petroleum drums, relocated and used items from the Rough Dry Inventory #7, Planer #6, Millworks Building #15/#5, Millworks Cut Stock #9, Particle Board Building #20, Storage Building #8, and Heavy Equipment Shop #22.

Eighteen 5'x 10' wooden crates filled with generated solid waste and construction debris were moved into Rough Dry Inventory #7. In October 1998, staff observed a large pile of solid waste and construction debris in the north area of the Stacker & Unstacker Building #11. The lessee was informed to dispose of the solid waste properly. NSP staff also submitted a solid waste complaint to the NNEPA Solid Waste Program.

In Planar #6, an NFPI guard stated that several abandoned 55-gallon drums had been emptied and did not know if the contents were used or not. From Millworks Building #15, the forklifts were removed to Storage Building #8. Bundles of lumber were transferred from Green Chain #16 to Millworks Building #15. In Millworks Cutstock #9, the lessee moved all the 5-gallon metal cans of adhesives to the southwest area of the building.

Particle Board Building #20 formerly contained four pressurized bottles, which could not be located and its location is currently unknown. An old PCB transformer that was located in Storage Building # 8 was also moved into Particle Board Building #20. The east area of the Particle Board building contained new metal scraps and construction remnants. Contained in Storage Building #8 were wooden crates filled with lumber, paper scraps, and plastic items. This building also contained two partially built mobile homes and various construction building items.

In Heavy Equipment Shop #22, the lessee cleaned equipment parts and disposed of the cleaning solutions in 50-gallon metal containers and possibly in metal vats. Six of the 55-gallon barrels labeled as TEXACO Antifreeze and UNOCAL oil were opened and used. Two other 55-gallon

polyethylene drums labeled as Muriatic Acid (hydrolic and corrosive acid) were observed at the west entrance. Sulfuric Acid previously located in the northwest area of this building was removed. The lessee also disposed of eight automotive batteries in the south area of this building.

CONCLUSION: Oversight by the Navajo Nation should have been performed to prevent unauthorized use of buildings, equipment, and chemicals, unauthorized movement of items, and improper handling and storage of waste.

RECOMMENDATIONS: An effective Oversight Policy is needed to guide the Navajo Nation's management requirements of Brownfields' sites. The outside areas of Heavy Equipment Shop#22, Power House #14, Millworks #15/#5, and Particle Board Building #20 are recommended for sampling, including the types listed in Section 7.4. The removed Sulfuric Acid should be located. The Muriatic Acid Drums, relocated Sulfuric Acid Drum, and balance of car batteries need to be removed and disposed of properly.

7.6 Waste Indicators

Waste indicators include stressed vegetation, spillage and leakage of hazardous substance, stained soil or permeable surfaces, leachate or waste seeps, waste materials, disposal areas, construction debris, drums, barrels or containers which presently or could have formerly contained hazardous substances, unusual odors, surface water discoloration, and free-floating product.



In the thirty-one buildings that were inventoried, NSP staff observed staining on the concrete floors. Dirt also covered the stained floors and exit areas used by vehicles. Stained concrete areas of the floor occurred because of leaking heavy equipment, discarded motor oil cans, and 5-gallon buckets used to store oily substances found in an upside down position.

These stained areas are also found near the bay doors, the vehicle storage area, and the equipment parts area. The stained areas represent a potential

for seepage into the ground should some areas have cracked concrete floors. The stains have a petroleum odor with the presence of a visible sheen and a black appearance mixed with dirt.



In most of the equipment and maintenance shops, 5-gallon metal or plastic buckets and 55-gallon barrels with unknown contents were observed. These abandoned containers may contain adhesives, solvents, spent oil, and/or gasoline. The containers did not have labels or markings to identify the contents. No staining was evident around these containers although some containers did not have lids.



Other items observed were large amounts of lubricants, aerosol spray paints, motor oils, and electrical materials or parts in the work areas of the Power House #14, Heavy Equipment Shop #22, Warehouse #13, Crane Green Chain Rough Sorting #16, Millworks Building #15, and Electric Maintenance Shop #18. Some of these unused items were stored in lockers, on worktables and on floors. On the second floor of Sawmill Building #10, hanging against the walls were saw blade parts, heavy equipment parts, electrical cables & conduits, and mechanical parts.

Throughout the buildings, numerous lighting fixtures containing mercury filaments were observed.

The Millworks Building #15 contained several uncovered 5-gallon metal and plastic buckets with solidifying adhesives. During the site inventory, the areas using a high volume of adhesives for finger-jointing lumber had an unusual strong odor. NSF staff experienced symptoms, as irritation to the eyes and nose with eventual development of headaches.

NFPI's solid waste disposal practice included discarded scrap lumber, metal scraps, and equipment parts that were piled in various areas inside and outside the buildings. The piles of scrap ranged from four to twenty-five square feet of debris. The majority of metal scraps, logging equipment scraps, and electrical fixtures are outside located north and east of Heavy Equipment Shop #22. Refer to the Inventory Sheet of Warehouse #21 dated June 20, 1997 compiled by NSP staff.

Other buildings used for maintaining logging equipment or vehicle maintenance contained a high volume of discarded motor oil containers, some paint cans, aerosol spray paints, and electrical parts.

CONCLUSION: The Brownfields Staff identified thirteen buildings with unknown substances that may require sampling to identify the contents. Solid waste should also properly be disposed of prior to leasing or sale of buildings. NO&G currently uses Warehouse #21.

RECOMMENDATION: The unknown substances are to be characterized through sampling and testing prior to correct disposal. See Appendix D for the comprehensive list of containers with unknown contents. Dispose of Solid Waste as noted above. An updated inventory, to check on chemicals left in Warehouse #21 prior to Navajo Oil & Gas, Inc.'s use of the building, is needed. A report following this inventory is to be put on file.

7.7 Subsurface Sumps or Clarifiers

Power House #14 contains the main discharge wastewater line, sumps, and the sumps with manholes that collect wastewater flows from the hot process, the clarifier, the boiler, and the cooling tower. The discharge sumps and the sump with manholes drain into the final inside

(interior) sump located in the middle of the Power House, which sends the composite wastewater to the final outside sump. Other discharge lines are located at the evaporation pits and the turbine floor area that drain into the final outside sump, which collectively sends the wastewater to the NTUA sewage lagoon.

During the site inventory, the final inside sump and the open floor drains located in the Power House were filled with discolored water and free-floating products. The evaporation pits located southwest of the Power House contained a white powdery substance.

CONCLUSION: The wastewater from the hot process contained chemicals as notated in Section 7.9. The evaporation pits contained sludge, which consisted of lime, sodium aluminate, soda ash, other impurities, and solids precipitated and removed from the on-site NFPI water source or the domestic NTUA water source. The sludge and solids were removed to the evaporation pits to dry for disposal.

RECOMMENDATION: Sediment samples are to be taken from the inside sumps and from the evaporation pits to verify the identity of the sludge. The main manhole drain should be relocated outside Power House #14.

7.8 Wastewater Drainage System

NFPI site operations utilized two types of separate discharge systems for gray water (toilet & sink drainage) and storm water. According to former NFPI employees, the main gray water drainage areas were combined from the discharges coming from Power House #14 and Cooling Tower #28 that collectively drained into the final outside sump located south of the Power House. The storm water and gray water runoffs from past NFPI operations had wastewater discharges coming from Cooling Tower and Power House. NFPI acknowledged in March 1991 that their wastewater contained solids which caused NTUA's sewage treatment ponds (lagoons) to fill up with sludge at a faster rate than usual. NFPI also acknowledged that their wastewater contained oil and grease at levels, which would not harm the pond's treatment. (15) Last, NFPI acknowledged that their wastewater was acidic, but disputed claim of debris which was surfacing at the sewage treatment ponds.

During the Brownfields site survey, Power House #14 contained various 55-gallon drums inside and an overturned carboy outside the building that may have contained pollutants, which could have potentially come into contact with storm water runoff. There were pipe-drains coming out of Sawmill Building #10, which may have non-storm water discharges. The opened and unlined drainage trench (ditch) coming from Power House #14, Cooling Tower #28, Stacker/Unstacker #11, Sawmill Building #10, and the Particle Board Buildings #8, #26, #20, & #19 was outlined by NSP Staff. See Figure 4-1 for surface drainages.

CONCLUSION: Evidence of unpermitted discharges had been discovered.

RECOMMENDATION: Sediment samples in the open unlined drainage trench adjacent to the Powerhouse and Sawmill buildings are to be collected.

7.9 Wastewater/Effluent Discharges

Wastewater discharges include waste stream (drainage) from sumps, a dry well near the clarifier, floor drains, compression blowdowns, and exterior pipe discharges.

NFPI used three main processes, which contributed to the waste stream that drained into the NTUA sewage lagoons. Discharge into the lagoons ceased when the hard-piping collapsed at Power House #14 prior to May 16, 1990 at which time the waste stream was discharged into the environment through unlined open trenches. The illegal discharge started from the south side of the Power House and flowed westward aboveground through the NFPI facility, under Route 12, finally discharging into the Tohdildonih Wash, which flows westward into the Black Creek.

The first process named *Hot Process* used Lime (Calcium Hydroxide) or Magnesium Oxide and Sodium Aluminate or Sodium Hydroxide to soften (remove hardness as Magnesium or Calcium) the NFPI on-site raw water source or the purchased NTUA domestic water source. The addition of chemicals precipitated impurities and hardness (solids) from the water source. The precipitate slurry was separated from the hot process overflow in the clarifier. The settled precipitates of the slurry was dried in the dry well prior to removal to storage and the slurry containing suspended solids was directed through a charcoal-based sand filter prior to discharge into the NTUA sewage lagoon or to the environment. The hot process overflow was directed through three filters prior to use as feedwater in the boiler.

The second process named *Boiler Blowdown Process* blew out recycled boiler water at 400°F to vaporize in the atmosphere with the balance condensing and discharging with suspended solids into the NTUA sewage lagoon or to the environment. Blowdowns occurred when the recycled boiler water's total dissolved solids concentrated between 18 and 22 ppm. This boiler operation discharged approximately 265,000 gallons of wastewater per day according to the Navajo RCR. This inspection report also documented the discharge's pH at 11.9. (6) The high pH is attributed to the addition of Sodium Hydroxide and Sodium Tripolyphosphate for the purpose of raising the boiler water's pH. To remove oxygen from the boiler water, Sodium Sulfite was added to prevent corrosion.

The third process named *Cooling Tower Blowdown Process* kept impurities and solids dissolved and suspended with the addition of Sulfuric Acid, which maintained the water at a lower pH. Also, descalents and algaecides were added to the Cooling Tower water to prevent scale formation on the pipes caused by dissolved solids and to prevent algal growth in the water. Blowdowns of water with suspended solids was discharged into the NTUA sewer lagoon or to the environment.

The NFPI sewer system also carried waste streams from toilets, sinks, and drinking water fountains to the NTUA sewer lagoon.

The NFPI storm water discharges were directed into the environment, using the same open unlined trenches mentioned in the above second paragraph.

Past wastewater problems reported by EPA and RCRA were unpermitted discharges of



wastewater into the Tohdildonih Wash. Description of the first noted discharge is steaming liquid with white suspended solids which were observed in the open unlined ditch (trench) located south of Power House #14 and coming from the Power House, Cooling Tower #28, and Dry Kilns #17/#23. The second notation informed of occasional on-site discharge of wastewater effluent caused by the plugged NFPI sewer line downstream of the drainage ditch. (15)

In response NFPI in October 1992 retained the services of Perma-Fix of New Mexico, Inc., who contracted with Mintech, Inc. to conduct 24-hour composite sampling from NFPI manholes, at Power House #14, the outside and final inside sumps, the evaporation pits, the cooling tower blowdown, the clarifier, the clarifier blowdown, and the boiler blowdown. Each manhole was sampled every four hours. See Appendix E for the analytical results of the composited wastewater samples.

CONCLUSIONS: The July 1993 EPA Evaluation report stated per telephone conversation with Norman Birtcher that the collapsed hard-piping was repaired but not verified. Reports to verify repairs in the case processes malfunction are absent.

RECOMMENDATIONS: A report of the repairs and an NSP or RCRA observation report should be sought, retrieved, noted and placed in the file. Records of the repair and a report should be provided. A contingency plan is needed to prevent exceedance of possible local ordinances preventing an overload of the NTUA sewer lagoon.

7.10 Aboveground Storage Tanks

The Aboveground Storage Tanks' (AST) registration is required if the tank contains hazardous waste/materials or requires a permit for flammable contents from the local fire department. The NNEPA AST Program is responsible for developing codes, regulations, and monitoring the installation and removal of tanks, as well as monitoring clean-ups of AST sites.

The NFPI site has been in operation since 1962. It is unknown if the ASTs were routinely maintained or if integrity tests were conducted on the drainage lines and the fittings. The available record shows a NNEPA AST site inspection was performed in March 1996, indicating the secondary containment for the fuel tank was inadequate and filled with sawdust. Secondly, the AST tanks were improperly labeled, had no corrosion protection, and had surrounding and underlying cracked concrete pads. Last, the AST loading/unloading area had staining and no secondary containment for spills. At the time of the NNEPA AST site inspection, it was assumed that the site would be operating again and recommended that AST deficiencies be upgraded to current industry standards. No maintenance records were available to show that the ASTs were routinely maintained, therefore leakage must be assumed. (16)

In October 1997, the Brownfields survey identified eight ASTs including five petroleum storage tanks in their upright position and three tanks in their horizontal position. These fuel tanks were surrounded by a 3-foot earthen berm composed of sawdust and dirt. The upright and horizontal tanks were located side by side. See Figure 7-1 for the NFPI above ground storage tanks.

The upright tanks are welded steel fuel storage tanks equipped with pipe gauges that extend



along the side of each tank to the valve port at the top. The capacity for the fuel storage tanks is two 10,700-gallon tanks that contain #2 Diesel fuel and the other three 12,000-gallon tanks that contain regular and unleaded gasoline. The fuel tanks are arranged numerically and marked as (#1) Chevron Regular, (#2) Unleaded, (#3) Chevron Diesel Fuel, (#4) Chevron Diesel Fuel, and (#5) Chevron Regular. Tanks #1 and #2 were empty and tanks #3, #4, and #5 were half to three-quarters full.



Directly behind the upright fuel tanks are three 8,000-gallon horizontal tanks that are numbered, as #6, #7, and #8. These tanks are connected to the upright fuel storage tanks with green colored rubber hoses

The #6 tank had a green rubber hose connected to storage tank (#1) Chevron Regular. The #7 tank had a rubber hose approximately 18 feet in length connected to the main distribution pipeline, which was connected to upright storage tanks #3 and #4 marked as Chevron Diesel Fuel.

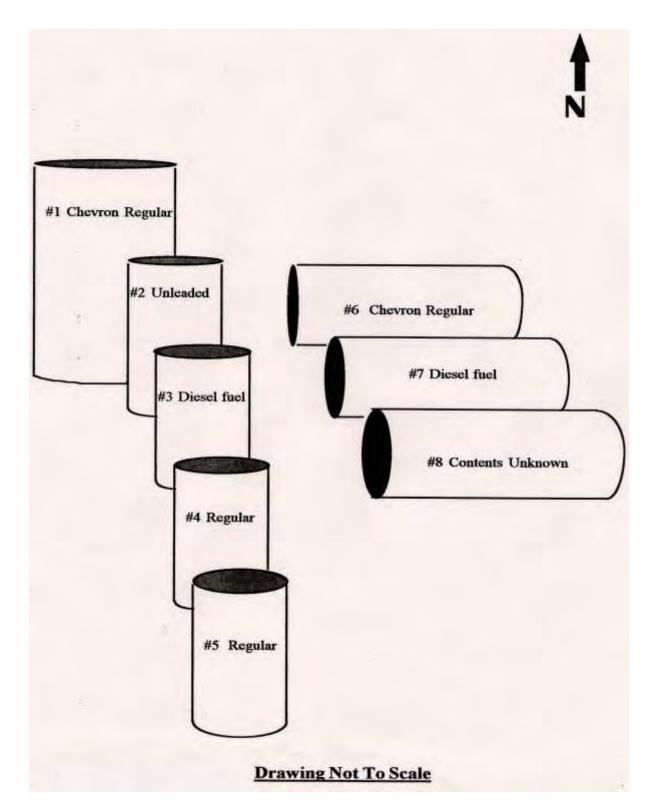
The #8 horizontal tank was not connected to the upright tanks, as the rubber hose was covered by dirt. The horizontal tanks measure 32 feet in length with a diameter of 34.5 feet.

The Brownfields site survey observed that the ground surrounding the fuel tanks had visible staining near and around the storage tanks areas. No placards were observed on the storage tanks except blue tags, which were attached to some of the tank pipes showing the fuel type. Some staining was noticeable, however it was difficult to determine if the leakage was from the pipes or rubber hoses. NNEPA AST Program previously advised NFPI that the green rubber hoses attached to the fuel storage tank pipe valves are not allowed by the 1998 Industry guidance and may have a potential leaking problem.

CONCLUSION: Containment was inadequate and not present, cracked and stained concrete and soiled areas were present, confusion of labeling still existed, no corrosion protection was identified, incorrect rubber hoses were used, and leakage is evident.

RECOMMENDATION: Empty the fuel according to approved guidelines. Test the area after removal of soil.

Figure 7-1 NFPI Aboveground Storage Tanks



7.11 Sensitive Receptors

Sensitive receptors are those that would be especially or adversely affected by a release of hazardous substances on the property. Sensitive receptors would include: exposed soil, surface water bodies, water courses, impoundments/reservoirs (lagoons, recharge basins and detention basins), wetlands, groundwater and its monitoring results, on-site residences, schools, hospitals, or the nature preserve.

Sensitive receptors are adjacent to the NFPI site. Directly northwest of the NFPI site are known wetland habitats that exist within and along the Tohdildonih Wash and the recreational area known as Red Lake. On May 8, 1993, Jan W. Briede, PhD, conducted an inspection of the ecosystem in and near the arroyo that flows from the NFPI site to Black Creek. The site was assessed to determine any possible damages caused by discharges of untreated wastewater. Assessed were, in particular, the condition and speciation of vegetation, indications of wildlife usage, and chemical analyses of discharges during the first week of October 1992. (15,16)

Two other arroyos south of Navajo, NM were also inspected for comparison. The overall assessments concluded that no adverse impacts occurred from the untreated wastewater discharge and the ecology was not affected. Mr. Briede further concluded that before the sawmill began operations, the arroyo was similar to desert arroyos with little value for wildlife and livestock. Initial discharges may have had some negative impacts on the ecosystem of the arroyo, Tohdildonih Wash and Black Creek. However, he estimates that the present ecosystem is at least 15 years old, particularly in the flood plain near Tohdildonih Wash and Black Creek. This means that no negative impact can be expected for at least the past 15 years. The discharges during the past 15 years will improve the ecosystem and its ability to act like a wetland filter. (15,16)

CONCLUSION: An ecological assessment of the vegetation and wildlife was performed, but did no include collection and analysis of sediment in the Tohdildonih Wash and Black Creek.

RECOMMENDATION: Sediment samples from the Tohdildonih Wash and Black Creek should be collected and analyzed to complete the assessment performed by Mr. Biede. The impact to residents who may use the water for irrigation and have their livestock graze in the area is currently at question.

7.12 NFPI Dump Site

The dumpsite is located adjacent to the south sandstone ridge. The dumpsite runs along the sandstone ridge that begins form the east area gradually rising to the top of the hill and sloping



downward into the west area. The east area of the dumpsite is covered with debris and solid waste such as white goods, wood scraps, scrap metals, and empty 5-gallon cans.

The dump area on top of the hill contains piles of wood scraps, scrap metal, scattered Chevron oil containers, and two abandoned and unlabeled 55-

gallon drums. One of these unlabeled drums contained a white powdery substance. Its chemical label has worn away and only the chemical placard indicating the contents as flammable and reactive was on the drum. The second unlabeled drum was half buried and did not have a chemical placard.





The west area of the dumpsite is covered with yellow-colored sawdust. An NSP Preliminary Assessment indicated the dumpsite to contain specific compounds, as formaldehyde and sulfuric acid. (4)

NSP staff noticed local residents hauling woodchips from the dumpsite, despite fencing restrictions. Adjacent to the dumpsite are tributaries that feed into Tohdildonih Wash, which flows into Black Creek. In May 1983, an Inspection of the Ecosystem Report was prepared to determine any possible damage caused by discharges or untreated wastewater. The vegetation and wildlife survey was used to complete the inspection near the arroyo that flows from the NFPI site to the Black Creek.

In July 1997, the NNEPA Air Quality Control Program incident report described a surface fire that occupied the southwest corner of the dumpsite. The surface fire smoldered for two

days until the Navajo Nation Window Rock Fire Station personnel extinguished the fire. Located southwest of the dumpsite is the NTCDC trailer park and several Navajo Housing Authority housing units. (17)

CONCLUSION: Sampling recommendations according to Section 7.4 were not performed. Sampling locations were selected to determine potential run-off contaminants from the dumpsite. Wood scraps and sawdust represent a continued threat of spontaneous combustion. Fencing around the dumpsite does not effectively restrict entrance and would be a liability issue.

RECOMMENDATION: Sediment sampling should be collected at the west and east area of the dumpsite which are flanked by tributaries that feed into the Tohdildonih Wash. Confirmation of DCBs from Section 7.4 should simultaneously be performed. Reuse of the wood scrap/sawdust and thereafter reclamation of the dumpsite should be explored to remove the liability issue potentially associated with unlawful entries by local residences, who may be exposed to combustion hazards.

REFERENCE LIST

- 1. U.S. Geological Survey, Buell Park Quadrangle, AZ, 7.5-Minute Series Topographic, provisional 1982.
- 2. Smith, Roscoe, Navajo Nation Property Management Department, personal communication with George Padilla, Navajo Superfund Program, July 1998.
- 3. Navajo Superfund Program, "Preliminary Assessment for the Navajo Forest Products Industries," prepared by Patrick Antonio for U.S. EPA Region IX, Window Rock, Arizona, July 31, 1991.
- 4. Navajo Superfund Program "Preliminary Assessment for the Navajo Community Dump," prepared by Derrith R. Moore for U.S. EPA Region IX, Window Rock, Arizona, September 24, 1990.
- Rodgers, Larry, "Chapter Images: 1996, Profiles of 110 Navajo Nation Chapters," 1997 Edition, Navajo Nation Division of Community Development, Window Rock, Arizona.
- 6. Padilla, Edward, Daniel Prime, Lori Garcia, U.S. EPA Region IX RCRA, Arlene Luther, Navajo EPA, and Norman Birtcher, Navajo Forest Products Industries, Inc., "Inspection Report," March 22, 1991.
- 7. Czajkowski, Greg, U.S. EPA Region IX Waste Compliance Section, to Normand Birtcher, Navajo Forest Products Industries, Inc., "Re: Certification of Violation Correction for Navajo Forest Products Industries, Navajo, NM 87328," June 16, 1994.
- 8. Abatement Technologies, Inc., "Navajo Forest Products Facility Asbestos Removal," prepared for Terranova Forest Products, Inc., October 2000.
- 9. Feeley, Michael, U.S. EPA Region IX Superfund, to Bennie Cohoe, NNEPA, letter: "Status of PCB Capacitor and Transformer Removal Action at the former Navajo Forest Products Industries (NFPI) Facility," July 1997.
- 10. Navajo Nation Superfund Program, Amended NFPI Site Management Plan, June 2000.
- 11. NNEPA Brownfields Pilot Project Report to the Economic Development Committee of the Navaio Nation Council, December 12, 1997.

- 12. Sanchez, Ernest A., Thermo Nutech Inc.'s, to Danny Atcitty, Navajo Nation Property Dept., letter re: Radiological Survey and Testing of Density Meters in NFPI Particle Board Plant at Navajo, NM, February 12, 1997, includes attachment of laboratory report.
- 13. Campbell, Vivian H., Nuclear Regulatory Commission' Senior Radiological Specialist, to Felix Todicheeinie, Navajo Nation Property Management Dept., letter re: Termination of NRC Radioactive Materials License at NFPI, Navajo New Mexico, October 7, 1997.
- 14. Butcher, Neil D., Ecology and Environment, Inc., "Navajo Forest Product Industries Site Assessment," prepared for U.S. EPA Region IX Superfund, October 31, 1991.
- 15. Birtcher, Norman, NFPI's Operations Manager, to Terry Oda, U. S. EPA Region IX, letter re: Response to May 4, 1993's Eight Directives of Unpermitted Discharges, May 27, 1993 plus Attachment as Letter re: Comprehensive Response to Items 1-6 of Section 308 requests, May 26, 1998 from Edward Richards, NFPI to Jeremy Johnstone, U. S. EPA.
- 16. Walton, Gregory R., Oil Pollution Prevention, 40 Code of Federal Regulations Part 112, July1, 1997 Edition, Office of the Federal Register, Washington, DC.
- 17. Luther, Arlene, Navajo Nation Environmental Protection Agency, "Incident Report," July 1997.

Appendix B EDR Reports

NFPI and Red Lake Rec. Center Navajo Route 12 / Cleveland Blvd Navajo, NM 87328

Inquiry Number: 3380164.2s

August 02, 2012

The EDR Radius Map™ Report with GeoCheck®

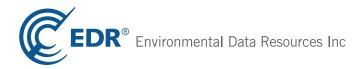


TABLE OF CONTENTS

SECTION	PAGE
Executive Summary	ES1
Overview Map.	2
Detail Map.	
Map Findings Summary	 4
Map Findings.	7
Orphan Summary	
Government Records Searched/Data Currency Tracking.	GR-1
GEOCHECK ADDENDUM	
Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting Source Map.	A-7
Physical Setting Source Map Findings.	A-8
Physical Setting Source Records Searched.	A-13

Thank you for your business.Please contact EDR at 1-800-352-0050 with any questions or comments.

Disclaimer - Copyright and Trademark Notice

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

Copyright 2012 by Environmental Data Resources, Inc. All rights reserved. Reproduction in any media or format, in whole or in part, of any report or map of Environmental Data Resources, Inc., or its affiliates, is prohibited without prior written permission.

EDR and its logos (including Sanborn and Sanborn Map) are trademarks of Environmental Data Resources, Inc. or its affiliates. All other trademarks used herein are the property of their respective owners.

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-05) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

NAVAJO ROUTE 12 / CLEVELAND BLVD NAVAJO, NM 87328

COORDINATES

Latitude (North): 35.9084000 - 35° 54' 30.24" Longitude (West): 109.0321000 - 109° 1' 55.56"

Universal Tranverse Mercator: Zone 12 UTM X (Meters): 677582.2 UTM Y (Meters): 3975377.5

Elevation: 7098 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 35109-H1 BUELL PARK, AZ NM

Most Recent Revision: 1982

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 2009, 2010 Source: USDA

NAVAJO RTE 12/ CLEVELAND RD & SHEPHERD SPRING RD

TARGET PROPERTY SEARCH RESULTS

NAVAJO, NM 87328

The target property was identified in the following records. For more information on this property see page 7 of the attached EDR Radius Map report:

Site Database(s) EPA ID

NAVAJO FOREST PRODUCTS INDUSTRIES US BROWNFIELDS

NAVAJO RTE 12/ CLEVELAND RD & SHEPHERD SPRING RD

NAVAJO, NM 87328

NAVAJO FOREST PRODUCTS INDUSTRIES FINDS

N/A

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

State- and tribal - equivalent CERCLIS

NPL list.

Federal NPL site list	
NPL Proposed NPL NPL LIENS	Proposed National Priority List Sites
Federal Delisted NPL site I	list
Delisted NPL	National Priority List Deletions
Federal CERCLIS list	
CERCLIS. FEDERAL FACILITY	Comprehensive Environmental Response, Compensation, and Liability Information System Federal Facility Site Information listing
Federal CERCLIS NFRAP	site List
CERC-NFRAP	CERCLIS No Further Remedial Action Planned
Federal RCRA CORRACTS	S facilities list
CORRACTS	Corrective Action Report
Federal RCRA non-CORRA	ACTS TSD facilities list
RCRA-TSDF	RCRA - Treatment, Storage and Disposal
Federal RCRA generators	list
RCRA-LOG	RCRA - Large Quantity Generators
RCRA-SQG	RCRA - Small Quantity Generators
RCRA-CESQG	RCRA - Conditionally Exempt Small Quantity Generator
Federal institutional control	ols / engineering controls registries
US ENG CONTROLS US INST CONTROL	Engineering Controls Sites List Sites with Institutional Controls
Federal ERNS list	
ERNS	Emergency Response Notification System

NM SHWS..... This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal

NM SCS..... State Cleanup Sites Listing

AZ SHWS..... ZipAcids List

State and tribal landfill and/or solid waste disposal site lists

NM SWF/LF..... Solid Waste Facilities

AZ SWF/LF..... Directory of Solid Waste Facilities

State and tribal leaking storage tank lists

NM LUST..... Leaking Underground Storage Tank Prioritization Database

AZ LUST..... Leaking Underground Storage Tank Listing

NM LTANKS..... Leaking Storage Tank Listing

NM LAST..... Leaking Aboveground Storage Tank Sites

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

NM TANKS..... Storage Tank Facility Listing

NM UST.....Listing of Underground Storage Tanks AZ UST..... Underground Storage Tank Listing NM AST..... Aboveground Storage Tanks List AZ AST.....List of Aboveground Storage Tanks

INDIAN UST...... Underground Storage Tanks on Indian Land

FEMA UST...... Underground Storage Tank Listing

State and tribal institutional control / engineering control registries

NM INST CONTROL..... Sites with Institutional Controls

State and tribal voluntary cleanup sites

NM VCP...... Voluntary Remediation Program Sites INDIAN VCP...... Voluntary Cleanup Priority Listing AZ VCP....... Voluntary Remediation Program Sites

State and tribal Brownfields sites

NM BROWNFIELDS..... Brownfields Site Listing AZ BROWNFIELDS..... Brownfields Tracking System

ADDITIONAL ENVIRONMENTAL RECORDS

Local Lists of Landfill / Solid Waste Disposal Sites

_____ Open Dump Inventory

DEBRIS REGION 9...... Torres Martinez Reservation Illegal Dump Site Locations

NM SWRCY...... Recycling Facility Listing

INDIAN ODI...... Report on the Status of Open Dumps on Indian Lands

Local Lists of Hazardous waste / Contaminated Sites

US CDL..... Clandestine Drug Labs

NM CDL..... Clandestine Drug Laboratory Listing

AZ CDL..... Clandestine Drug Labs

US HIST CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

LUCIS.....Land Use Control Information System

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System

NM SPILLS..... Spill Data

AZ SPILLS..... Hazardous Material Logbook

Other Ascertainable Records

CONSENT...... Superfund (CERCLA) Consent Decrees

TRIS...... Toxic Chemical Release Inventory System

TSCA..... Toxic Substances Control Act

Act)/TSCA (Toxic Substances Control Act)

HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing

SSTS..... Section 7 Tracking Systems

ICIS...... Integrated Compliance Information System

RAATS......RCRA Administrative Action Tracking System

NM ASBESTOS...... List of Asbestos Demolition and Renovations Jobs SCRD DRYCLEANERS...... State Coalition for Remediation of Drycleaners Listing

PCB TRANSFORMER...... PCB Transformer Registration Database

COAL ASH EPA..... Coal Combustion Residues Surface Impoundments List

EPA WATCH LIST..... EPA WATCH LIST

EDR PROPRIETARY RECORDS

EDR Proprietary Records

Manufactured Gas Plants..... EDR Proprietary Manufactured Gas Plants

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.

Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in **bold italics** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

ADDITIONAL ENVIRONMENTAL RECORDS

Other Ascertainable Records

RCRA-NonGen: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA-NonGen list, as provided by EDR, and dated 03/15/2012 has revealed that there is 1 RCRA-NonGen site within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Direction / Distance	Map ID	Page
PONDEROSA PROD INC	SHEPHERD SPRING B	LVD AT W 1/8 - 1/4 (0.189 mi.)	3	10

INDIAN RESERV: This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

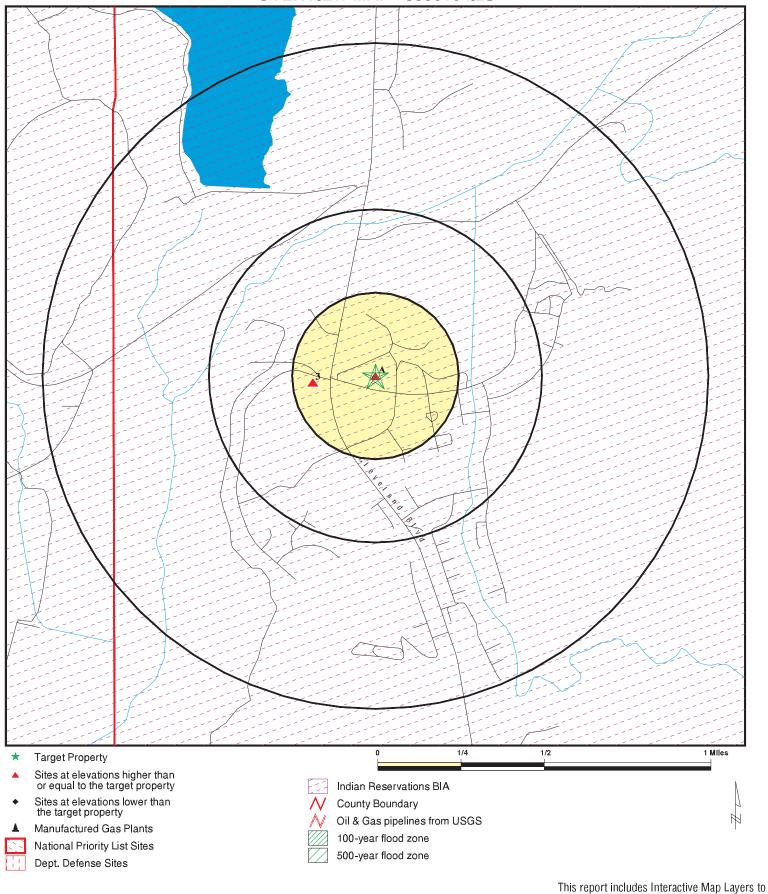
A review of the INDIAN RESERV list, as provided by EDR, and dated 12/31/2005 has revealed that there is 1 INDIAN RESERV site within approximately 1 mile of the target property.

Equal/Higher Elevation	evation Address		Map ID	Page
NAVAJO INDIAN RESERVATION		0 - 1/8 (0.000 mi.)	0	10

Due to poor or inadequate address information, the following sites were not mapped. Count: 44 records.

Site Name	Database(s)
JR THEROUX MOBILE HOME PARK	NM SCS
DIAL OIL	NM SCS
STEAMBOAT DIP VAT	AZ SHWS
NAZLINI DIP VAT	AZ SHWS
GANADO COMMUNITY DUMP	AZ SHWS
SECTION 25 OPEN PIT MINE	CERCLIS
NAVAJO FOREST PRODUCTS INDUSTRIES	CERCLIS, RCRA-NonGen, FINDS
NAZLINI DIP VAT	CERC-NFRAP
NAVAJO - COMMUNITY OPEN DUMP	CERC-NFRAP
USDOI NPS - HUBBELL TRADING POST N	RCRA-SQG, FINDS
SAGE MEMORIAL HOSPITAL	RCRA-LQG
SAGE MEMORIAL HOSPITAL	RCRA-NonGen, FINDS, INDIAN UST
BNSF RAILWAY CO-RIGHT OF WAY	RCRA-NonGen
PONDEROSA PRODUCTS INC	RCRA-NonGen
USDOI BIA CRYSTAL BOARDING SCHOOL	RCRA-CESQG, FINDS
KIN DAH LICHII OLTA' CHARTER SCHOO	RCRA-CESQG
GANADO WATER OPER AND MAINT	RCRA-CESQG, FINDS
NAVAJO PINE HIGH SCHOOL	RCRA-CESQG
RED MESA EXPRESS-THRIFTWAY 502	FINDS
STEAMBOAT TRADING POST, RED MESA C	FINDS
RED MESA #508	FINDS
RED MESA #508 AKA GREASEWOOD TRADI	INDIAN UST
MORA'S CONOCO	INDIAN UST
BALDWIN SERVICE STATION AKA MCCRAY	INDIAN UST
APACHE COUNTY ROADS MAINTENANCE	INDIAN UST
GANADO FIRE DISTRICT	INDIAN UST
GANADO UNIFED SCHOOL DISTRICT	INDIAN UST
REID'S SERVICE STATION	INDIAN UST
ADOT - GANADO MAINTENANCE FACILITY	INDIAN UST
GANADO LAKE TRADING POST	INDIAN UST
NAVAJO WATER MAINTENANCE DEPT, BUR	INDIAN UST
MUSTANG GIANT #7252	INDIAN UST
SANDIA OIL NAVAJO CONOCO (OLD FINA	INDIAN UST
CLEVELAND SERVICE STATION	INDIAN UST
THRIFTWAY 238	INDIAN UST
RED MESA EXPRESS/THRIFTWAY 502	INDIAN UST
ELI WILLIAMS SERVICE STATION	INDIAN UST
APACHE COUNTY ROADS MAINTENANCE	INDIAN LUST
GANADO FIRE DISTRICT	INDIAN LUST
BALDWIN SERVICE STATION AKA MCCRAY	INDIAN LUST
NAVAJO WATER MAINTENANCE DEPT, BUR	INDIAN LUST
RED MESA #508 AKA GREASEWOOD TRADI	INDIAN LUST
GANADO UNIFED SCHOOL DISTRICT	INDIAN LUST
MUSTANG GIANT #7252	INDIAN LUST

OVERVIEW MAP - 3380164.2s



display and/or hide map information. The legend includes only those icons for the default map view.

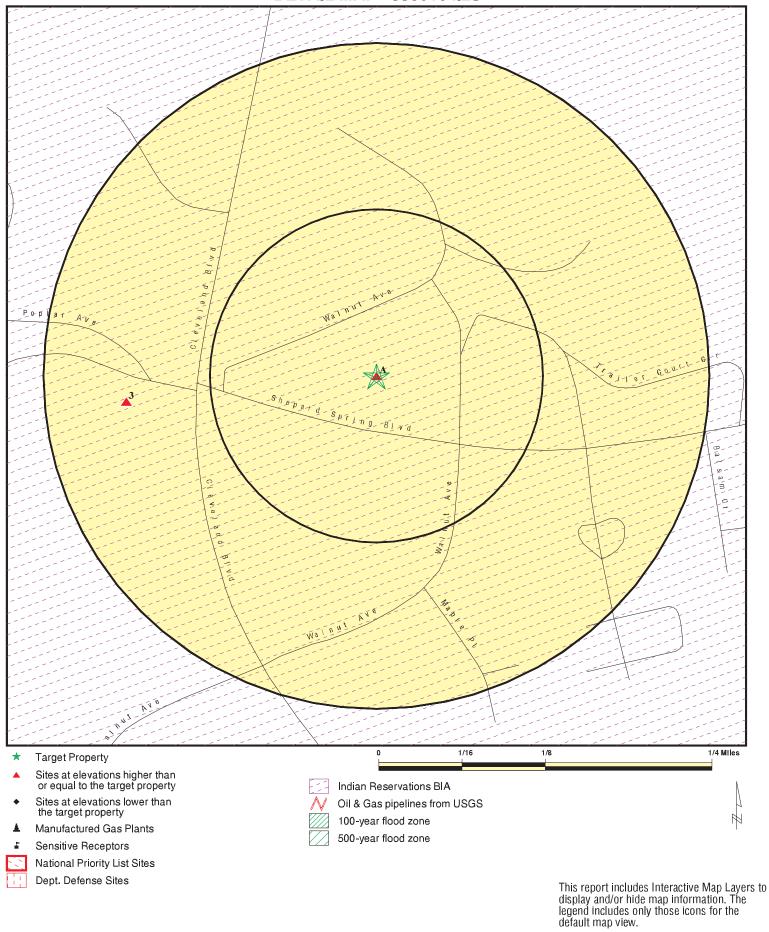
SITE NAME: NFPI and Red Lake Rec. Center ADDRESS: Navajo Route 12 / Cleveland Blvd

Navajo NM 87328 LAT/LONG: 35.9084 / 109.0321 CLIENT: Daniel B. Stephens Assoc. Inc. CONTACT: Micah Nauck

INQUIRY#: 3380164.2s

DATE: August 02, 2012 5:11 pm

DETAIL MAP - 3380164.2s



SITE NAME: NFPI and Red Lake Rec. Center ADDRESS: Navajo Route 12 / Cleveland Blvd CUIENT: Daniel B. Stephens Assoc. Inc. CONTACT: Micah Nauck

Navajo NM 87328 LAT/LONG: 35.9084 / 109.0321 INQUIRY #: 3380164.2s DATE: August 02, 2012 5:14 pm

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENT	AL RECORDS							
Federal NPL site list								
NPL Proposed NPL NPL LIENS	1.000 1.000 TP		0 0 NR	0 0 NR	0 0 NR	0 0 NR	NR NR NR	0 0 0
Federal Delisted NPL site	list							
Delisted NPL	1.000		0	0	0	0	NR	0
Federal CERCLIS list								
CERCLIS FEDERAL FACILITY	0.500 1.000		0 0	0 0	0 0	NR 0	NR NR	0 0
Federal CERCLIS NFRAP	site List							
CERC-NFRAP	0.500		0	0	0	NR	NR	0
Federal RCRA CORRACT	S facilities lis	st						
CORRACTS	1.000		0	0	0	0	NR	0
Federal RCRA non-CORR	RACTS TSD fa	acilities list						
RCRA-TSDF	0.500		0	0	0	NR	NR	0
Federal RCRA generators	s list							
RCRA-LQG RCRA-SQG RCRA-CESQG	0.250 0.250 0.250		0 0 0	0 0 0	NR NR NR	NR NR NR	NR NR NR	0 0 0
Federal institutional cont engineering controls regi								
US ENG CONTROLS US INST CONTROL	0.500 0.500		0 0	0 0	0 0	NR NR	NR NR	0 0
Federal ERNS list								
ERNS	TP		NR	NR	NR	NR	NR	0
State- and tribal - equival	ent CERCLIS	;						
NM SHWS NM SCS AZ SHWS	N/A 1.000 N/A		N/A 0 N/A	N/A 0 N/A	N/A 0 N/A	N/A 0 N/A	N/A NR N/A	N/A 0 N/A
State and tribal landfill ar solid waste disposal site								
NM SWF/LF AZ SWF/LF	0.500 0.500		0 0	0 0	0 0	NR NR	NR NR	0 0
State and tribal leaking s	torage tank li	sts						
NM LUST AZ LUST	0.500 0.500		0	0 0	0 0	NR NR	NR NR	0 0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
NM LTANKS NM LAST INDIAN LUST	0.500 0.500 0.500		0 0 0	0 0 0	0 0 0	NR NR NR	NR NR NR	0 0 0
State and tribal registere	d storage tai	nk lists						
NM TANKS NM UST AZ UST NM AST AZ AST INDIAN UST FEMA UST	0.250 0.250 0.250 0.250 0.250 0.250 0.250		0 0 0 0 0	0 0 0 0 0 0	NR NR NR NR NR NR	NR NR NR NR NR NR	NR NR NR NR NR NR	0 0 0 0 0 0
State and tribal institution control / engineering con		es						
NM INST CONTROL	0.500		0	0	0	NR	NR	0
State and tribal voluntary	/ cleanup site	es						
NM VCP INDIAN VCP AZ VCP	0.500 0.500 0.500		0 0 0	0 0 0	0 0 0	NR NR NR	NR NR NR	0 0 0
State and tribal Brownfie	lds sites							
NM BROWNFIELDS AZ BROWNFIELDS	0.500 0.500		0 0	0 0	0 0	NR NR	NR NR	0 0
ADDITIONAL ENVIRONMEN	ADDITIONAL ENVIRONMENTAL RECORDS							
Local Brownfield lists								
US BROWNFIELDS	0.500	1	0	0	0	NR	NR	1
Local Lists of Landfill / S Waste Disposal Sites	Solid							
ODI DEBRIS REGION 9 NM SWRCY INDIAN ODI	0.500 0.500 0.500 0.500		0 0 0 0	0 0 0 0	0 0 0 0	NR NR NR NR	NR NR NR NR	0 0 0
Local Lists of Hazardous Contaminated Sites	waste /							
US CDL NM CDL AZ CDL US HIST CDL	TP TP TP TP		NR NR NR NR	NR NR NR NR	NR NR NR NR	NR NR NR NR	NR NR NR NR	0 0 0 0
Local Land Records								
LIENS 2 LUCIS	TP 0.500		NR 0	NR 0	NR 0	NR NR	NR NR	0 0
Records of Emergency F	Release Repo	orts						
HMIRS	TP		NR	NR	NR	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
NM SPILLS AZ SPILLS	TP TP		NR NR	NR NR	NR NR	NR NR	NR NR	0 0
Other Ascertainable Reco	ords							
Other Ascertainable Reco	0.250 TP 1.000 1.000 1.000 1.000 0.500 0.250 TP	1	0 R 0 0 0 0 0 0 R R R R R R R R R R R R	1 R O O O O O O R R R R R R R R R R R R	RR O O O O O RRRRRRRRRRRRRRRRRRRRRRRRR	RR 0 0 0 0 RR	RR	1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
EPA WATCH LIST	TP TP		NR	NR NR	NR	NR NR	NR NR	0 0
EDR PROPRIETARY RECORDS								
EDR Proprietary Records	;							
Manufactured Gas Plants	1.000		0	0	0	0	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

N/A = This State does not maintain a SHWS list. See the Federal CERCLIS list.

Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

A1 NAVAJO FOREST PRODUCTS INDUSTRIES (NFPI) US BROWNFIELDS 1012173414
Target NAVAJO RTE 12/ CLEVELAND RD & SHEPHERD SPRING RD N/A

Property NAVAJO, NM 87328

Site 1 of 2 in cluster A

Actual: 7098 ft.

US BROWNFIELDS:
Recipient name: Navajo Nation Environmental Protection Agency

Grant type: Assessment

Property name: Navajo Forest Products Industries (NFPI)

Property #: Not reported Parcel size: 12.5 Latitude: 35.911601 -109.031609 Longitude: HCM label: Not reported Map scale: Not reported Point of reference: Not reported Datum: Not reported ACRES property ID: 14291 Start date: Not reported Completed date: Not reported Acres cleaned up: Not reported Cleanup funding: Not reported Cleanup funding source: Not reported Assessment funding: Not reported Assessment funding source: Not reported Redevelopment funding: Not reported Redev. funding source: Not reported Redev. funding entity name: Not reported Redevelopment start date: Not reported Assessment funding entity: Not reported Cleanup funding entity: Not reported

Grant type: N/A

Accomplishment type: Phase I Environmental Assessment

Ownership entity: Not reported Current owner: Not reported Did owner change: Not reported Cleanup required: Yes

Video available: Not reported Photo available: Not reported Institutional controls required: Not reported IC Category proprietary controls: Not reported IC cat. info. devices: Not reported IC cat. gov. controls: Not reported IC cat. enforcement permit tools: Not reported IC in place date: Not reported Unknown IC in place: State/tribal program date: Not reported State/tribal program ID: Not reported State/tribal NFA date: Not reported Air contaminated:

Air cleaned: Not reported Asbestos found: Not reported Asbestos cleaned: Not reported Not reported Controled substance found: Controled substance cleaned: Not reported Drinking water affected: Not reported Not reported Drinking water cleaned: Groundwater affected: Not reported

EDR ID Number

Map ID MAP FINDINGS

Direction Distance Elevation

ation Site Database(s) EPA ID Number

NAVAJO FOREST PRODUCTS INDUSTRIES (NFPI) (Continued)

1012173414

EDR ID Number

Groundwater cleaned: Not reported Lead contaminant found: Not reported Not reported Lead cleaned up: Not reported No media affected: Unknown media affected: Not reported Other cleaned up: Not reported Other metals found: Not reported Other metals cleaned: Not reported Other contaminants found: Not reported Other contams found description: Not reported Not reported PAHs found: PAHs cleaned up: Not reported PCBs found: Not reported PCBs cleaned up: Not reported Petro products found: Not reported Petro products cleaned: Not reported Not reported Sediments found: Sediments cleaned: Not reported Soil affected:

Not reported Soil cleaned up: Surface water cleaned: Not reported Unknown found: Not reported Not reported VOCs found: VOCs cleaned: Not reported Cleanup other description: Not reported Num. of cleanup and re-dev. jobs: Not reported Past use greenspace acreage: Not reported Past use residential acreage: Not reported Past use commercial acreage: Not reported Past use industrial acreage: Not reported Future use greenspace acreage: Not reported Future use residential acreage: Not reported Future use commercial acreage: Not reported Future use industrial acreage: Not reported Greenspace acreage and type: Not reported Superfund Fed. landowner flag: Not reported

Recipient name: Navajo Nation Environmental Protection Agency

Grant type: Assessment

Property name: Navajo Forest Products Industries (NFPI)

Property #: Not reported Parcel size: 12.5 Latitude: 35.911601 Longitude: -109.031609 HCM label: Not reported Map scale: Not reported Point of reference: Not reported Datum: Not reported ACRES property ID: 14291 Start date: Not reported Completed date: Not reported Acres cleaned up: Not reported Cleanup funding: Not reported Cleanup funding source: Not reported Assessment funding: Not reported Assessment funding source: Not reported Redevelopment funding: Not reported

MAP FINDINGS Map ID Direction

Distance Elevation

Site Database(s) **EPA ID Number**

NAVAJO FOREST PRODUCTS INDUSTRIES (NFPI) (Continued)

1012173414

EDR ID Number

Redev. funding source: Not reported Redev. funding entity name: Not reported 30-SEP-98 Redevelopment start date: Not reported Assessment funding entity: Cleanup funding entity: Not reported

Grant type: N/A

Accomplishment type: Not reported Ownership entity: Not reported Current owner: Not reported Did owner change: Not reported

Not reported

Cleanup required: Yes

Photo available: Not reported Institutional controls required: Not reported IC Category proprietary controls: Not reported IC cat. info. devices: Not reported Not reported IC cat. gov. controls: IC cat. enforcement permit tools: Not reported IC in place date: Not reported IC in place: Unknown State/tribal program date: Not reported State/tribal program ID: Not reported State/tribal NFA date: Not reported

Video available:

Air contaminated: Air cleaned: Not reported Not reported Asbestos found: Asbestos cleaned: Not reported Controled substance found: Not reported Controled substance cleaned: Not reported Not reported Drinking water affected: Drinking water cleaned: Not reported Groundwater affected: Not reported Groundwater cleaned: Not reported Lead contaminant found: Not reported Not reported Lead cleaned up: Not reported No media affected: Unknown media affected: Not reported Other cleaned up: Not reported Other metals found: Not reported Other metals cleaned: Not reported Other contaminants found: Not reported Other contams found description: Not reported PAHs found: Not reported PAHs cleaned up: Not reported PCBs found: Not reported PCBs cleaned up: Not reported Petro products found: Not reported Petro products cleaned: Not reported Sediments found: Not reported Not reported Sediments cleaned: Soil affected:

Soil cleaned up: Not reported Not reported Surface water cleaned: Unknown found: Not reported VOCs found: Not reported Not reported VOCs cleaned: Cleanup other description: Not reported

MAP FINDINGS Map ID

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

NAVAJO FOREST PRODUCTS INDUSTRIES (NFPI) (Continued)

1012173414

Num. of cleanup and re-dev. jobs:0

Past use greenspace acreage: Not reported Past use residential acreage: Not reported Past use commercial acreage: Not reported Past use industrial acreage: Not reported Future use greenspace acreage: Not reported Future use residential acreage: Not reported Future use commercial acreage: Not reported Future use industrial acreage: Not reported Greenspace acreage and type: Not reported Superfund Fed. landowner flag: Not reported

PARTICLE BOARD FACTORY/MILLWORKS/MAINTENANCE SHOPS Property Description:

A2 NAVAJO FOREST PRODUCTS INDUSTRIES (NFPI) NAVAJO RTE 12/ CLEVELAND RD & SHEPHERD SPRING RD **Target**

FINDS

INDIAN RESERV CIND100321

FINDS

N/A

N/A

1012239218

NAVAJO, NM 87328 Property

Site 2 of 2 in cluster A

Actual: 7098 ft. FINDS:

Registry ID: 110039533467

Environmental Interest/Information System

US EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES)

is an federal online database for Brownfields Grantees to

electronically submit data directly to EPA.

IND RES **NAVAJO INDIAN RESERVATION**

Region NAVAJO INDIAN RESERVATION (County), AZ

< 1/8 1 ft.

INDIAN RESERV:

Feature: Indian Reservation Name: Navajo Indian Reservation

Agency: BIA State: AZ-NM-UT

3 **PONDEROSA PROD INC** RCRA-NonGen 1000188246

SHEPHERD SPRING BLVD AT HWY 12 West 1/8-1/4 **NAVAJO, NM 87328**

0.189 mi. 997 ft.

RCRA-NonGen: Relative:

Higher Date form received by agency: 04/11/2008

> Facility name: PONDEROSA PROD INC

Actual: Facility address: SHEPHERD SPRING BLVD AT HWY 12

7124 ft. NAVAJO, NM 87328 EPA ID: NMD120388574

PO BOX 1288 Mailing address: NAVAJO, NM 87328 NMD120388574

Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

PONDEROSA PROD INC (Continued)

1000188246

EDR ID Number

Contact: DALE FUENTES
Contact address: PO BOX 1288

NAVAJO, NM 87328

Contact country: US

Contact telephone: (505) 777-2234 Contact email: Not reported

EPA Region: 06

Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: NAVAJO FOREST PROD

Owner/operator address: UNKNOWN

UNKNOWN, NM 00000

Owner/operator country: Not reported
Owner/operator telephone: (000) 000-0000
Legal status: Private

Owner/Operator Type: Owner
Owner/Op start date: Not reported
Owner/Op end date: Not reported

Owner/operator name: NAVAJO FOREST PROD

Owner/operator address: UNKNOWN

UNKNOWN, NM 00000

Not reported

Owner/operator telephone: (000) 000-0000
Legal status: Private
Owner/Operator Type: Operator
Owner/Op start date: Not reported
Owner/Op end date: Not reported

Handler Activities Summary:

Owner/operator country:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 06/19/1997

Facility name: PONDEROSA PROD INC Classification: Not a generator, verified

Hazardous Waste Summary:

Waste code: D001

Map ID MAP FINDINGS Direction

Elevation

Distance

Site Database(s) **EPA ID Number**

PONDEROSA PROD INC (Continued)

1000188246

EDR ID Number

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

> LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET. WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Waste code:

Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL

ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL

ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT

MIXTURES.

Violation Status: No violations found

FINDS:

Registry ID: 110007977859

Environmental Interest/Information System

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA

program staff to track the notification, permit, compliance, and

corrective action activities required under RCRA.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address		Database(s)	
CRYSTAL	1001488824	USDOI BIA CRYSTAL BOARDING SCHOOL	MI POST 5 STATE HWY 134	87328	RCRA-CESQG, FINDS	
GANADO	1009392522	RED MESA #508 AKA GREASEWOOD TRADI	HIGHWAY 15 GREASEWOOD, AZ	86505	INDIAN UST	
GANADO	1009391860	MORA'S CONOCO	HWY 191 & 264	86505	INDIAN UST	
GANADO	1010492705	RED MESA EXPRESS-THRIFTWAY 502	HWY 264 - STEAMBOAT	86505	FINDS	
GANADO	1004754678	SAGE MEMORIAL HOSPITAL	HWY 264	86505	RCRA-LQG	
GANADO	1001480974	SAGE MEMORIAL HOSPITAL	HWY 264	86505	RCRA-NonGen, FINDS, INDIAN UST	
GANADO	1010559364	APACHE COUNTY ROADS MAINTENANCE	HWY 264 NEAR 191	86505	INDIAN LUST	
GANADO	1010559361	GANADO FIRE DISTRICT	HWY 264	86505	INDIAN LUST	
GANADO	1009392561	BALDWIN SERVICE STATION AKA MCCRAY	HWY 264	86505	INDIAN UST	
GANADO	1009393961	BALDWIN SERVICE STATION AKA MCCRAY	HWY 264	86505	INDIAN LUST	
GANADO	1009392877	APACHE COUNTY ROADS MAINTENANCE	HWY 264 NEAR 191	86505	INDIAN UST	
GANADO	1009392866	GANADO FIRE DISTRICT	HWY 264 AT MILEPOST 446.8	86505	INDIAN UST	
GANADO	1009391808	GANADO UNIFED SCHOOL DISTRICT	HWY 264 AT SERVICE ROAD LOOP	86505	INDIAN UST	
GANADO	1014395019	KIN DAH LICHII OLTA' CHARTER SCHOO	HWY 264 5 MILES EAST OF GANADO	86505	RCRA-CESQG	
GANADO	1009392962	REID'S SERVICE STATION	HWY 264, KINLICHEE	86505	INDIAN UST	
GANADO	1009391753	ADOT - GANADO MAINTENANCE FACILITY	S.R. 264, MP 445.3	86505	INDIAN UST	
GANADO	1014868637	STEAMBOAT TRADING POST, RED MESA C	50	86505	FINDS	
GANADO	1010496587	RED MESA #508	HC 58, BOX 70	86505	FINDS	
GANADO	1009391934	GANADO LAKE TRADING POST	P.O. BOX 209	86505	INDIAN UST	
GANADO	1009392983	NAVAJO WATER MAINTENANCE DEPT, BUR	BURNSIDE JUNCTION HWY 15 & 264	86505	INDIAN UST	
GANADO	1009508539	NAVAJO WATER MAINTENANCE DEPT, BUR	BURNSIDE JUNCTION HWY 15TH &	86505	INDIAN LUST	
GANADO	1009393878	RED MESA #508 AKA GREASEWOOD TRADI	GREASEWOOD AZ	86505	INDIAN LUST	
GANADO	1004674798	USDOI NPS - HUBBELL TRADING POST N	HALF MI W OF HWY 264	86505	RCRA-SQG, FINDS	
GANADO	1009391964	MUSTANG GIANT #7252	US HWY 191 & 264 BURNSIDE JUNC	86505	INDIAN UST	
GANADO	1009393830	GANADO UNIFED SCHOOL DISTRICT	HWY LOOP	86505	INDIAN LUST	
GANADO	1000482869	STEAMBOAT DIP VAT	60 MILES W OF WINDOW ROCK	86505	AZ SHWS	
GANADO	1003879537	NAZLINI DIP VAT	14 M. NE OF GANADO, ON NAVAJO	86505	CERC-NFRAP	
GANADO	1004754627	GANADO WATER OPER AND MAINT	E OF JCT SR 164 AND US 191	86505	RCRA-CESQG, FINDS	
GANADO	1000483156	NAZLINI DIP VAT	14 NE OF GANADO ON NAVAJO	86505	AZ SHWS	
GANADO	1000483159	GANADO COMMUNITY DUMP	SEC 25	86505	AZ SHWS	
GANADO	1009393869	MUSTANG GIANT #7252	USHY 191 & 264 BURNSIDE JCT	86505	INDIAN LUST	
HOUCK	1010312556	BNSF RAILWAY CO-RIGHT OF WAY	EXIT 348 OFF HIGHWAY I40	86505	RCRA-NonGen	
MCKINLEY COUNTY	1014915075	SECTION 25 OPEN PIT MINE	LAT 35 DEG 19'58" LONG 107 DEG		CERCLIS	
NAVAJO	1009393414	SANDIA OIL NAVAJO CONOCO (OLD FINA	S.R. 134	87328	INDIAN UST	
NAVAJO	S108954571	JR THEROUX MOBILE HOME PARK	NAVAJO MILE 56 & RT 12		NM SCS	
NAVAJO	S108954669	DIAL OIL	25 OF NAVAJO		NM SCS	
NAVAJO	1009393543	CLEVELAND SERVICE STATION	NAVAJO, NM	87328	INDIAN UST	
NAVAJO	1003879553	NAVAJO - COMMUNITY OPEN DUMP	1 M OF NAVAJO RTE 12/BA RO	87328	CERC-NFRAP	
NAVAJO	1000870979	NAVAJO FOREST PRODUCTS INDUSTRIES	SHEPARD SPRING BLVD NE	87328	CERCLIS, RCRA-NonGen, FINDS	
NAVAJO	1000870986	PONDEROSA PRODUCTS INC	SHEPHERD SPRING BLVD HWY 12	87328	RCRA-NonGen	
NAVAJO	1009393369	THRIFTWAY 238	STATE HWY 134	87328	INDIAN UST	
NAVAJO	1014395016	NAVAJO PINE HIGH SCHOOL	1 W WALNUT AVE	87328	RCRA-CESQG	
STEAMBOAT	1009391922	RED MESA EXPRESS/THRIFTWAY 502	HWY 264	86505	INDIAN UST	

Count: 44 records. ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
STEAMBOAT	1009908306	ELI WILLIAMS SERVICE STATION	HWY 264 3 MILES WEST OF STEAMB	86505	INDIAN UST

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 05/08/2012 Source: EPA
Date Data Arrived at EDR: 05/10/2012 Telephone: N/A

Number of Days to Update: 5 Next Scheduled EDR Contact: 10/22/2012
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources

EPA's Environmental Photographic Interpretation Center (EPIC)

Telephone: 202-564-7333

EPA Region 1 EPA Region 6

Telephone 617-918-1143 Telephone: 214-655-6659

EPA Region 3 EPA Region 7

Telephone 215-814-5418 Telephone: 913-551-7247

EPA Region 4 EPA Region 8

Telephone 404-562-8033 Telephone: 303-312-6774

EPA Region 5 EPA Region 9

Telephone 312-886-6686 Telephone: 415-947-4246

EPA Region 10

Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 03/30/2012 Source: EPA
Date Data Arrived at EDR: 04/05/2012 Telephone: N/A

Number of Days to Update: 40 Next Scheduled EDR Contact: 10/22/2012
Data Release Frequency: Quarterly

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Source: EPA

Date of Government Version: 10/15/1991 Date Data Arrived at EDR: 02/02/1994 Date Made Active in Reports: 03/30/1994

Number of Days to Update: 56

Telephone: 202-564-4267

Last EDR Contact: 08/15/2011

Next Scheduled EDR Contact: 11/28/2011 Data Release Frequency: No Update Planned

Federal Delisted NPL site list

DELISTED NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 03/30/2012 Date Data Arrived at EDR: 04/05/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 40

Source: EPA Telephone: N/A

Last EDR Contact: 07/05/2012 Next Scheduled EDR Contact: 10/22/2012

Next Scheduled EDR Contact: 10/22/20
Data Release Frequency: Quarterly

Federal CERCLIS list

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 12/27/2011 Date Data Arrived at EDR: 02/27/2012 Date Made Active in Reports: 03/12/2012

Number of Days to Update: 14

Source: EPA

Telephone: 703-412-9810 Last EDR Contact: 07/05/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Quarterly

FEDERAL FACILITY: Federal Facility Site Information listing

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 12/10/2010 Date Data Arrived at EDR: 01/11/2011 Date Made Active in Reports: 02/16/2011

Number of Days to Update: 36

Source: Environmental Protection Agency

Telephone: 703-603-8704 Last EDR Contact: 07/13/2012

Next Scheduled EDR Contact: 10/22/2012 Data Release Frequency: Varies

Federal CERCLIS NFRAP site List

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 12/28/2011 Date Data Arrived at EDR: 02/27/2012 Date Made Active in Reports: 03/12/2012

Number of Days to Update: 14

Source: EPA

Telephone: 703-412-9810 Last EDR Contact: 07/05/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Quarterly

Federal RCRA CORRACTS facilities list

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 08/19/2011 Date Data Arrived at EDR: 08/31/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 132

Source: EPA

Telephone: 800-424-9346 Last EDR Contact: 05/15/2012

Next Scheduled EDR Contact: 08/27/2012 Data Release Frequency: Quarterly

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 03/15/2012 Date Data Arrived at EDR: 04/04/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 41

Source: Environmental Protection Agency

Telephone: 214-665-6444 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Quarterly

Federal RCRA generators list

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/15/2012 Date Data Arrived at EDR: 04/04/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 41

Source: Environmental Protection Agency

Telephone: 214-665-6444 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Quarterly

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 03/15/2012 Date Data Arrived at EDR: 04/04/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 41

Source: Environmental Protection Agency

Telephone: 214-665-6444 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Quarterly

RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/15/2012 Date Data Arrived at EDR: 04/04/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 41

Source: Environmental Protection Agency

Telephone: 214-665-6444 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Varies

Federal institutional controls / engineering controls registries

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 12/30/2011 Date Data Arrived at EDR: 12/30/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 11

Source: Environmental Protection Agency

Telephone: 703-603-0695 Last EDR Contact: 06/11/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Varies

US INST CONTROL: Sites with Institutional Controls

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 12/30/2011 Date Data Arrived at EDR: 12/30/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 11

Source: Environmental Protection Agency

Telephone: 703-603-0695 Last EDR Contact: 06/11/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Varies

Federal ERNS list

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 04/02/2012 Date Data Arrived at EDR: 04/03/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 72

Source: National Response Center, United States Coast Guard

Telephone: 202-267-2180 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Annually

State- and tribal - equivalent CERCLIS

NM SCS: State Cleanup Sites Listing

State cleanup sites that fall under the state's Water Quality Control Commission Regulations.

Date of Government Version: 10/28/2011 Date Data Arrived at EDR: 01/03/2012 Date Made Active in Reports: 02/06/2012

Number of Days to Update: 34

Source: Environment Department Telephone: 505-827-2855 Last EDR Contact: 07/27/2012

Next Scheduled EDR Contact: 11/05/2012 Data Release Frequency: Varies

NM SHWS: This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal NPL list.

State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: N/A Date Data Arrived at EDR: N/A Date Made Active in Reports: N/A Number of Days to Update: N/A Source: Department of the Environment

Telephone: 505-827-2918 Last EDR Contact: 06/29/2012

Next Scheduled EDR Contact: 10/15/2012

Data Release Frequency: N/A

AZ SHWS: ZipAcids List

The ACIDS list consists of more than 750 locations subject to investigation under the State Water Quality Assurance Revolving Fund (WQARF) and Federal CERCLA programs. The list is no longer updated by the state.

Date of Government Version: N/A Source: Department of Environmental Quality
Date Data Arrived at EDR: N/A Telephone: 602-771-4360

Date Made Active in Reports: N/A

Last EDR Contact: 06/21/2012

Number of Days to Update: N/A Next Scheduled EDR Contact: 10/08/2012

Data Release Frequency: N/A

State and tribal landfill and/or solid waste disposal site lists

NM SWF/LF: Solid Waste Facilities

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 05/16/2012 Date Data Arrived at EDR: 05/18/2012 Date Made Active in Reports: 06/26/2012

Number of Days to Update: 39

Source: New Mexico Environment Department

Telephone: 505-827-0347 Last EDR Contact: 05/15/2012

Next Scheduled EDR Contact: 08/27/2012 Data Release Frequency: Semi-Annually

AZ SWF/LF: Directory of Solid Waste Facilities

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 03/01/2012 Date Data Arrived at EDR: 06/08/2012 Date Made Active in Reports: 07/10/2012

Number of Days to Update: 32

Source: Department of Environmental Quality

Telephone: 602-771-2300 Last EDR Contact: 06/04/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: Annually

State and tribal leaking storage tank lists

NM LUST: Leaking Underground Storage Tank Priorization Database

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 08/01/2006 Date Data Arrived at EDR: 10/06/2006 Date Made Active in Reports: 11/08/2006

Number of Days to Update: 33

Source: New Mexico Environment Department

Telephone: 505-476-4397 Last EDR Contact: 07/09/2012

Next Scheduled EDR Contact: 10/22/2012
Data Release Frequency: No Update Planned

AZ LUST: Leaking Underground Storage Tank Listing

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 04/09/2012 Date Data Arrived at EDR: 04/10/2012 Date Made Active in Reports: 05/09/2012

Number of Days to Update: 29

Source: Department of Environmental Quality

Telephone: 602-771-4345 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Semi-Annually

NM LTANKS: Leaking Storage Tank Listing
A listing of leaking storage tank site locations.

Date of Government Version: 01/26/2012 Date Data Arrived at EDR: 04/16/2012 Date Made Active in Reports: 05/31/2012

Number of Days to Update: 45

Source: Environment Department Telephone: 505-476-4390 Last EDR Contact: 07/11/2012

Next Scheduled EDR Contact: 10/22/2012 Data Release Frequency: Varies

NM LAST: Leaking Aboveground Storage Tank Sites
A listing of leaking aboveground storage tank sites.

Date of Government Version: 05/01/2006 Date Data Arrived at EDR: 05/01/2006 Date Made Active in Reports: 06/05/2006

Number of Days to Update: 35

Source: Environment Department Telephone: 505-476-4397 Last EDR Contact: 07/09/2012

Next Scheduled EDR Contact: 10/22/2012 Data Release Frequency: No Update Planned

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 09/12/2011 Date Data Arrived at EDR: 09/13/2011 Date Made Active in Reports: 11/11/2011

Number of Days to Update: 59

Source: EPA Region 6 Telephone: 214-665-6597 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Varies

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 05/07/2012 Date Data Arrived at EDR: 05/08/2012 Date Made Active in Reports: 07/10/2012

Number of Days to Update: 63

Source: EPA Region 10 Telephone: 206-553-2857 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Quarterly

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 08/18/2011 Date Data Arrived at EDR: 08/19/2011 Date Made Active in Reports: 09/13/2011

Number of Days to Update: 25

Source: EPA Region 8 Telephone: 303-312-6271 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/26/2012 Data Release Frequency: Quarterly

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 05/25/2012 Date Data Arrived at EDR: 05/25/2012 Date Made Active in Reports: 07/16/2012

Number of Days to Update: 52

Source: Environmental Protection Agency

Telephone: 415-972-3372 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Quarterly

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land
A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 04/12/2012 Date Data Arrived at EDR: 05/09/2012 Date Made Active in Reports: 07/10/2012

Number of Days to Update: 62

Source: EPA Region 1 Telephone: 617-918-1313 Last EDR Contact: 05/01/2012

Next Scheduled EDR Contact: 08/13/2012

Data Release Frequency: Varies

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 12/14/2011 Date Data Arrived at EDR: 12/15/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 26

Source: EPA Region 4 Telephone: 404-562-8677 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Semi-Annually

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 02/07/2012 Date Data Arrived at EDR: 02/17/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 88

Source: EPA Region 7 Telephone: 913-551-7003 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Varies

State and tribal registered storage tank lists

NM TANKS: Storage Tank Facility Listing

A listing of aboveground and underground storage tank site locations.

Date of Government Version: 04/25/2012 Date Data Arrived at EDR: 04/26/2012 Date Made Active in Reports: 05/31/2012

Number of Days to Update: 35

Source: Environment Department Telephone: 505-476-4390 Last EDR Contact: 06/08/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: Varies

NM UST: Listing of Underground Storage Tanks

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 08/01/2006 Date Data Arrived at EDR: 09/27/2006 Date Made Active in Reports: 10/23/2006

Number of Days to Update: 26

Source: New Mexico Environment Department

Telephone: 505-476-4397 Last EDR Contact: 06/04/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: No Update Planned

AZ UST: Underground Storage Tank Listing

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 04/09/2012 Date Data Arrived at EDR: 04/10/2012 Date Made Active in Reports: 05/11/2012

Number of Days to Update: 31

Source: Department of Environmental Quality

Telephone: 602-771-4345 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Annually

NM AST: Aboveground Storage Tanks List

Aboveground tanks that have been inspected by the State Fire Marshal.

Date of Government Version: 08/01/2006 Date Data Arrived at EDR: 09/27/2006 Date Made Active in Reports: 10/20/2006

Number of Days to Update: 23

Source: Environment Department Telephone: 505-476-4397 Last EDR Contact: 06/04/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: No Update Planned

AZ AST 2: Aboveground Storage Tank Listing

A listing of aboveground storage tank site locations.

Date of Government Version: 04/16/2012 Date Data Arrived at EDR: 04/17/2012 Date Made Active in Reports: 05/11/2012

Number of Days to Update: 24

Source: Department of Environmental Quality

Telephone: 602-771-4380 Last EDR Contact: 06/17/2012

Next Scheduled EDR Contact: 10/01/2012 Data Release Frequency: Varies

AZ AST: List of Aboveground Storage Tanks

Aboveground storage tanks that the Dept. of Building & Fire Safety have permitted.

Date of Government Version: 12/31/2000 Date Data Arrived at EDR: 01/22/2001 Date Made Active in Reports: 02/16/2001

Number of Days to Update: 25

Source: Department of Building & Fire Safety

Telephone: 602-364-1003 Last EDR Contact: 06/14/2012

Next Scheduled EDR Contact: 10/01/2012 Data Release Frequency: No Update Planned

INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 65 Tribes).

Date of Government Version: 05/10/2011 Source: EPA R

Date Data Arrived at EDR: 05/11/2011 Date Made Active in Reports: 06/14/2011

Number of Days to Update: 34

Source: EPA Region 6 Telephone: 214-665-7591 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Semi-Annually

INDIAN UST R1: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 04/12/2012 Date Data Arrived at EDR: 05/02/2012 Date Made Active in Reports: 07/16/2012

Number of Days to Update: 75

Source: EPA, Region 1 Telephone: 617-918-1313 Last EDR Contact: 05/01/2012

Next Scheduled EDR Contact: 08/13/2012 Data Release Frequency: Varies

INDIAN UST R5: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 02/28/2012 Date Data Arrived at EDR: 02/29/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 76

Source: EPA Region 5 Telephone: 312-886-6136 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Varies

INDIAN UST R4: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations)

Date of Government Version: 12/14/2011 Date Data Arrived at EDR: 12/15/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 26

Source: EPA Region 4 Telephone: 404-562-9424 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Semi-Annually

INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 11/28/2011 Date Data Arrived at EDR: 11/29/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 42

Source: EPA Region 9 Telephone: 415-972-3368 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Quarterly

INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 08/18/2011 Date Data Arrived at EDR: 08/19/2011 Date Made Active in Reports: 09/13/2011

Number of Days to Update: 25

Source: EPA Region 8 Telephone: 303-312-6137 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Quarterly

INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

Date of Government Version: 02/07/2012 Date Data Arrived at EDR: 02/17/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 88

Source: EPA Region 7 Telephone: 913-551-7003 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Varies

INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

Date of Government Version: 05/07/2012 Date Data Arrived at EDR: 05/08/2012 Date Made Active in Reports: 07/16/2012

Number of Days to Update: 69

Source: EPA Region 10 Telephone: 206-553-2857 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Quarterly

FEMA UST: Underground Storage Tank Listing

A listing of all FEMA owned underground storage tanks.

Date of Government Version: 01/01/2010 Date Data Arrived at EDR: 02/16/2010 Date Made Active in Reports: 04/12/2010

Number of Days to Update: 55

Source: FEMA

Telephone: 202-646-5797 Last EDR Contact: 07/12/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Varies

State and tribal institutional control / engineering control registries

NM INST CONTROL: Sites with Institutional Controls

Sites included in the Voluntary Cleanup listing that have Institutional Controls in place.

Date of Government Version: 03/31/2012 Date Data Arrived at EDR: 04/26/2012 Date Made Active in Reports: 05/31/2012

Number of Days to Update: 35

Source: Environment Department Telephone: 505-827-2754 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/05/2012 Data Release Frequency: Varies

State and tribal voluntary cleanup sites

NM VCP: Voluntary Remediation Program Sites

Sites involved in the Voluntary Remediation Program.

Date of Government Version: 03/31/2012 Date Data Arrived at EDR: 04/26/2012 Date Made Active in Reports: 05/31/2012

Number of Days to Update: 35

Source: Environment Department Telephone: 505-827-2754 Last EDR Contact: 07/26/2012

Next Scheduled EDR Contact: 11/05/2012 Data Release Frequency: Varies

INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 02/17/2012 Date Data Arrived at EDR: 04/03/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 42

Source: EPA, Region 1 Telephone: 617-918-1102 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Varies

AZ VCP: Voluntary Remediation Program Sites

Sites involved in the Voluntary Remediation Program.

Date of Government Version: 04/05/2012 Date Data Arrived at EDR: 04/09/2012 Date Made Active in Reports: 04/17/2012

Number of Days to Update: 8

Source: Department of Environmental Quality

Telephone: 602-771-4411 Last EDR Contact: 07/09/2012

Next Scheduled EDR Contact: 10/08/2012

Data Release Frequency: Varies

INDIAN VCP R7: Voluntary Cleanup Priority Lisitng

A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008 Date Data Arrived at EDR: 04/22/2008 Date Made Active in Reports: 05/19/2008

Number of Days to Update: 27

Source: EPA, Region 7 Telephone: 913-551-7365 Last EDR Contact: 04/20/2009

Next Scheduled EDR Contact: 07/20/2009 Data Release Frequency: Varies

State and tribal Brownfields sites

NM BROWNFIELDS: Brownfields Site Listing
A listing of targeted brownfields assessment.

Date of Government Version: 02/09/2012 Date Data Arrived at EDR: 03/14/2012 Date Made Active in Reports: 04/27/2012

Number of Days to Update: 44

Source: New Mexico Environment Telephone: 505-827-0171 Last EDR Contact: 06/15/2012

Next Scheduled EDR Contact: 08/27/2012 Data Release Frequency: Varies

AZ BROWNFIELDS: Brownfields Tracking System Information relating to Brownfields sites in Arizona.

Date of Government Version: 04/05/2012 Date Data Arrived at EDR: 04/09/2012 Date Made Active in Reports: 04/17/2012

Number of Days to Update: 8

Source: Department of Environmental Quality

Telephone: 602-771-4401 Last EDR Contact: 07/09/2012

Next Scheduled EDR Contact: 10/08/2012

Data Release Frequency: Varies

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: A Listing of Brownfields Sites

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

Date of Government Version: 06/27/2011 Date Data Arrived at EDR: 06/27/2011 Date Made Active in Reports: 09/13/2011

Number of Days to Update: 78

Source: Environmental Protection Agency

Telephone: 202-566-2777 Last EDR Contact: 06/25/2012

Next Scheduled EDR Contact: 10/08/2012 Data Release Frequency: Semi-Annually

Local Lists of Landfill / Solid Waste Disposal Sites

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258

Subtitle D Criteria.

Date of Government Version: 06/30/1985 Date Data Arrived at EDR: 08/09/2004 Date Made Active in Reports: 09/17/2004

Number of Days to Update: 39

Source: Environmental Protection Agency

Telephone: 800-424-9346 Last EDR Contact: 06/09/2004 Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009 Date Data Arrived at EDR: 05/07/2009 Date Made Active in Reports: 09/21/2009

Number of Days to Update: 137

Source: EPA, Region 9 Telephone: 415-947-4219 Last EDR Contact: 07/03/2012

Next Scheduled EDR Contact: 10/08/2012 Data Release Frequency: No Update Planned

NM SWRCY: Recycling Facility Listing
A listing of recycling facility locations.

Date of Government Version: 05/16/2012 Date Data Arrived at EDR: 05/18/2012 Date Made Active in Reports: 06/26/2012

Number of Days to Update: 39

Source: Environment Department Telephone: 505-827-0197 Last EDR Contact: 05/15/2012

Next Scheduled EDR Contact: 08/27/2012 Data Release Frequency: Varies

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998 Date Data Arrived at EDR: 12/03/2007 Date Made Active in Reports: 01/24/2008

Number of Days to Update: 52

Source: Environmental Protection Agency

Telephone: 703-308-8245 Last EDR Contact: 05/07/2012

Next Scheduled EDR Contact: 08/20/2012 Data Release Frequency: Varies

Local Lists of Hazardous waste / Contaminated Sites

US CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 03/16/2012 Date Data Arrived at EDR: 06/12/2012 Date Made Active in Reports: 07/16/2012

Number of Days to Update: 34

Source: Drug Enforcement Administration

Telephone: 202-307-1000 Last EDR Contact: 06/04/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: Quarterly

NM CDL: Clandestine Drug Laboratory Listing

A listing of clandestine drug labs, such as illegal methamphetamine labs.

Date of Government Version: 10/25/2011 Date Data Arrived at EDR: 10/26/2011 Date Made Active in Reports: 11/28/2011

Number of Days to Update: 33

Source: Environment Department Telephone: 505-476-6000 Last EDR Contact: 07/23/2012

Next Scheduled EDR Contact: 11/05/2012 Data Release Frequency: Varies

AZ CDL: Clandestine Drug Labs

A listing of drug lab seizures in Arizona.

Date of Government Version: 04/19/2012 Date Data Arrived at EDR: 04/26/2012 Date Made Active in Reports: 05/09/2012

Number of Days to Update: 13

Source: Board of Technical Registration

Telephone: 602-364-4931 Last EDR Contact: 06/27/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Varies

US HIST CDL: National Clandestine Laboratory Register

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 09/01/2007 Date Data Arrived at EDR: 11/19/2008 Date Made Active in Reports: 03/30/2009

Number of Days to Update: 131

Source: Drug Enforcement Administration

Telephone: 202-307-1000 Last EDR Contact: 03/23/2009

Next Scheduled EDR Contact: 06/22/2009 Data Release Frequency: No Update Planned

Local Lists of Registered Storage Tanks

AZ AST 2: Aboveground Storage Tank Listing

A listing of aboveground storage tank site locations.

Date of Government Version: 04/16/2012 Date Data Arrived at EDR: 04/17/2012 Date Made Active in Reports: 05/11/2012

Number of Days to Update: 24

Source: Department of Environmental Quality

Telephone: 602-771-4380 Last EDR Contact: 06/17/2012

Next Scheduled EDR Contact: 10/01/2012 Data Release Frequency: Varies

Local Land Records

LIENS 2: CERCLA Lien Information

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 02/16/2012 Date Data Arrived at EDR: 03/26/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 80

Source: Environmental Protection Agency

Telephone: 202-564-6023 Last EDR Contact: 07/27/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Varies

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 12/09/2005 Date Data Arrived at EDR: 12/11/2006 Date Made Active in Reports: 01/11/2007

Number of Days to Update: 31

Source: Department of the Navy Telephone: 843-820-7326 Last EDR Contact: 05/21/2012

Next Scheduled EDR Contact: 09/03/2012 Data Release Frequency: Varies

Records of Emergency Release Reports

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 04/01/2012 Date Data Arrived at EDR: 04/03/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 72

Source: U.S. Department of Transportation

Telephone: 202-366-4555 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Annually

NM SPILLS: Spill Data

Hazardous materials spills data.

Date of Government Version: 01/12/2006 Date Data Arrived at EDR: 01/23/2006 Date Made Active in Reports: 02/27/2006

Number of Days to Update: 35

Source: Environment Department Telephone: 505-827-0166 Last EDR Contact: 06/29/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Varies

AZ SPILLS: Hazardous Material Logbook

Chemical spills and incidents referred to the Emergency Response Unit.

Date of Government Version: 11/15/2001 Date Data Arrived at EDR: 06/28/2007 Date Made Active in Reports: 07/24/2007

Number of Days to Update: 26

Source: Department of Environmental Quality

Telephone: 602-771-4153 Last EDR Contact: 06/04/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: Varies

Other Ascertainable Records

RCRA-NonGen: RCRA - Non Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 03/15/2012 Date Data Arrived at EDR: 04/04/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 41

Source: Environmental Protection Agency

Telephone: 214-665-6444 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Varies

DOT OPS: Incident and Accident Data

Department of Transporation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 07/29/2011 Date Data Arrived at EDR: 08/09/2011 Date Made Active in Reports: 11/11/2011

Number of Days to Update: 94

Source: Department of Transporation, Office of Pipeline Safety

Telephone: 202-366-4595 Last EDR Contact: 05/08/2012

Next Scheduled EDR Contact: 08/20/2012 Data Release Frequency: Varies

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 11/10/2006 Date Made Active in Reports: 01/11/2007

Number of Days to Update: 62

Source: USGS Telephone: 888-275-8747

Last EDR Contact: 07/19/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Semi-Annually

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/2009 Date Data Arrived at EDR: 08/12/2010 Date Made Active in Reports: 12/02/2010

Number of Days to Update: 112

Source: U.S. Army Corps of Engineers

Telephone: 202-528-4285 Last EDR Contact: 06/11/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Varies

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/01/2011 Date Data Arrived at EDR: 01/25/2012 Date Made Active in Reports: 03/01/2012

Number of Days to Update: 36

Source: Department of Justice, Consent Decree Library

Telephone: Varies

Last EDR Contact: 06/27/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Varies

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 02/27/2012 Date Data Arrived at EDR: 03/14/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 92

Source: EPA

Telephone: 703-416-0223 Last EDR Contact: 06/13/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Annually

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 09/14/2010 Date Data Arrived at EDR: 10/07/2011 Date Made Active in Reports: 03/01/2012

Number of Days to Update: 146

Source: Department of Energy Telephone: 505-845-0011 Last EDR Contact: 05/29/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Varies

MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 08/18/2011 Date Data Arrived at EDR: 09/08/2011 Date Made Active in Reports: 09/29/2011

Number of Days to Update: 21

Source: Department of Labor, Mine Safety and Health Administration

Telephone: 303-231-5959 Last EDR Contact: 06/05/2012

Next Scheduled EDR Contact: 09/17/2012 Data Release Frequency: Semi-Annually

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2009 Date Data Arrived at EDR: 09/01/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 131

Source: EPA

Telephone: 202-566-0250 Last EDR Contact: 05/29/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Annually

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2006 Date Data Arrived at EDR: 09/29/2010 Date Made Active in Reports: 12/02/2010

Number of Days to Update: 64

Source: EPA

Telephone: 202-260-5521 Last EDR Contact: 06/29/2012

Next Scheduled EDR Contact: 10/08/2012 Data Release Frequency: Every 4 Years

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act) FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009 Date Data Arrived at EDR: 04/16/2009 Date Made Active in Reports: 05/11/2009

Number of Days to Update: 25

Source: EPA/Office of Prevention, Pesticides and Toxic Substances

Telephone: 202-566-1667 Last EDR Contact: 05/23/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Quarterly

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009 Date Data Arrived at EDR: 04/16/2009 Date Made Active in Reports: 05/11/2009

Number of Days to Update: 25

Source: EPA

Telephone: 202-566-1667 Last EDR Contact: 05/23/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006 Date Data Arrived at EDR: 03/01/2007 Date Made Active in Reports: 04/10/2007

Number of Days to Update: 40

Source: Environmental Protection Agency

Telephone: 202-564-2501 Last EDR Contact: 12/17/2007

Next Scheduled EDR Contact: 03/17/2008 Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006 Date Data Arrived at EDR: 03/01/2007 Date Made Active in Reports: 04/10/2007

Number of Days to Update: 40

Source: Environmental Protection Agency

Telephone: 202-564-2501 Last EDR Contact: 12/17/2008

Next Scheduled EDR Contact: 03/17/2008 Data Release Frequency: No Update Planned

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2009 Date Data Arrived at EDR: 12/10/2010 Date Made Active in Reports: 02/25/2011

Number of Days to Update: 77

Source: EPA Telephone: 202-564-4203 Last EDR Contact: 07/27/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 07/20/2011 Date Data Arrived at EDR: 11/10/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 61

Source: Environmental Protection Agency

Telephone: 202-564-5088 Last EDR Contact: 06/21/2012

Next Scheduled EDR Contact: 10/08/2012 Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 11/01/2010 Date Data Arrived at EDR: 11/10/2010 Date Made Active in Reports: 02/16/2011

Number of Days to Update: 98

Source: EPA

Telephone: 202-566-0500 Last EDR Contact: 07/19/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Annually

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 06/21/2011 Date Data Arrived at EDR: 07/15/2011 Date Made Active in Reports: 09/13/2011

Number of Days to Update: 60

Source: Nuclear Regulatory Commission

Telephone: 301-415-7169 Last EDR Contact: 06/11/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Quarterly

RADINFO: Radiation Information Database

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 01/10/2012 Date Data Arrived at EDR: 01/12/2012 Date Made Active in Reports: 03/01/2012

Number of Days to Update: 49

Source: Environmental Protection Agency

Telephone: 202-343-9775 Last EDR Contact: 07/11/2012

Next Scheduled EDR Contact: 10/22/2012 Data Release Frequency: Quarterly

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 10/23/2011 Date Data Arrived at EDR: 12/13/2011 Date Made Active in Reports: 03/01/2012

Number of Days to Update: 79

Source: EPA

Telephone: (214) 665-2200 Last EDR Contact: 06/12/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Quarterly

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995 Date Data Arrived at EDR: 07/03/1995 Date Made Active in Reports: 08/07/1995

Number of Days to Update: 35

Source: EPA

Telephone: 202-564-4104 Last EDR Contact: 06/02/2008

Next Scheduled EDR Contact: 09/01/2008 Data Release Frequency: No Update Planned

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2009 Date Data Arrived at EDR: 03/01/2011 Date Made Active in Reports: 05/02/2011

Number of Days to Update: 62

Source: EPA/NTIS Telephone: 800-424-9346 Last EDR Contact: 06/01/2012

Next Scheduled EDR Contact: 09/10/2012 Data Release Frequency: Biennially

AZ MANIFEST: Manifest Information Hazardous waste manifest information

> Date of Government Version: 12/31/2007 Date Data Arrived at EDR: 10/20/2009 Date Made Active in Reports: 11/16/2009

Number of Days to Update: 27

Source: Department of Environmental Quality

Telephone: N/A

Last EDR Contact: 06/21/2012

Next Scheduled EDR Contact: 10/08/2012 Data Release Frequency: Annually

NM DRYCLEANERS: Drycleaner Facility Listing

A listing of drycleaner facility locations. The listing may contain facilities that are no longer there, or under different management.

Date of Government Version: 01/06/2010 Date Data Arrived at EDR: 01/07/2010 Date Made Active in Reports: 02/04/2010

Number of Days to Update: 28

Source: Environment Department Telephone: 505-222-9507 Last EDR Contact: 06/29/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: No Update Planned

AZ DRYCLEANERS: Drycleaner Facility Listing A listing of drycleaner facilities in Arizona.

Date of Government Version: 01/20/2006 Date Data Arrived at EDR: 01/25/2006 Date Made Active in Reports: 02/15/2006

Number of Days to Update: 21

Source: Department of Environmental Quality

Telephone: 602-771-4335 Last EDR Contact: 06/21/2012

Next Scheduled EDR Contact: 10/08/2012 Data Release Frequency: Varies

NM NPDES: List of Discharge Permits

General information regarding NPDES (National Pollutant Discharge Elimination System) permits.

Date of Government Version: 03/13/2012 Date Data Arrived at EDR: 04/26/2012 Date Made Active in Reports: 05/31/2012

Number of Days to Update: 35

Source: Environment Department Telephone: 505-827-2918 Last EDR Contact: 07/27/2012

Next Scheduled EDR Contact: 11/05/2012 Data Release Frequency: Semi-Annually

NM AIRS: Airs Information

A listing of facilities with Air Quality Bureau permits.

Date of Government Version: 06/06/2012 Date Data Arrived at EDR: 06/07/2012 Date Made Active in Reports: 07/20/2012

Number of Days to Update: 43

Source: New Mexico Environment Department

Telephone: 505-476-4339 Last EDR Contact: 07/30/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Annually

AZ AIRS: Arizona Airs Database

Arizona major (has the potential to emit over 100 tons of criteria pollutant) and minor (below 100 tons) sources.

Date of Government Version: 05/09/2012 Date Data Arrived at EDR: 05/10/2012 Date Made Active in Reports: 06/12/2012

Number of Days to Update: 33

Source: Department of Environmental Quality

Telephone: 602-771-2344 Last EDR Contact: 07/03/2012

Next Scheduled EDR Contact: 10/22/2012 Data Release Frequency: Semi-Annually

NM ASBESTOS: List of Asbestos Demolition and Renovations Jobs

Asbestos is a common fibrous rock found worldwide which has been used in various products for over 4500 years. It has been used in over 3000 different products such as textiles, paper, ropes, wicks, stoves, filters, floor tiles, roofing shingles, clutch facings, water pipe, cements, fillers, felt, fireproof clothing, gaskets, battery boxes, clapboard, wallboard, fire doors, fire curtains, insulation, brake linings, etc.

Date of Government Version: 04/01/2007 Date Data Arrived at EDR: 05/09/2007 Date Made Active in Reports: 05/30/2007

Number of Days to Update: 21

Source: New Mexico Environment Department

Telephone: 505-827-1494 Last EDR Contact: 07/27/2012

Next Scheduled EDR Contact: 11/12/2012 Data Release Frequency: Varies

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 12/08/2006 Date Made Active in Reports: 01/11/2007

Number of Days to Update: 34

Source: USGS

Telephone: 202-208-3710 Last EDR Contact: 07/19/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Semi-Annually

SCRD DRYCLEANERS: State Coalition for Remediation of Drycleaners Listing

The State Coalition for Remediation of Drycleaners was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

Date of Government Version: 03/07/2011 Date Data Arrived at EDR: 03/09/2011 Date Made Active in Reports: 05/02/2011

Number of Days to Update: 54

Source: Environmental Protection Agency

Telephone: 615-532-8599 Last EDR Contact: 07/19/2012

Next Scheduled EDR Contact: 11/05/2012 Data Release Frequency: Varies

PCB TRANSFORMER: PCB Transformer Registration Database

The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 02/01/2011 Date Data Arrived at EDR: 10/19/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 83

Source: Environmental Protection Agency

Telephone: 202-566-0517 Last EDR Contact: 05/04/2012

Next Scheduled EDR Contact: 08/13/2012 Data Release Frequency: Varies

COAL ASH EPA: Coal Combustion Residues Surface Impoundments List

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 08/17/2010 Date Data Arrived at EDR: 01/03/2011 Date Made Active in Reports: 03/21/2011

Number of Days to Update: 77

Source: Environmental Protection Agency

Telephone: N/A

Last EDR Contact: 06/12/2012

Next Scheduled EDR Contact: 09/24/2012 Data Release Frequency: Varies

US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 05/24/2012 Date Data Arrived at EDR: 06/05/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 9

Source: Environmental Protection Agency

Telephone: 202-566-1917 Last EDR Contact: 05/21/2012

Next Scheduled EDR Contact: 09/03/2012 Data Release Frequency: Quarterly

EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 03/31/2012 Date Data Arrived at EDR: 05/17/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 28

Source: Environmental Protection Agency

Telephone: 617-520-3000 Last EDR Contact: 05/15/2012

Next Scheduled EDR Contact: 08/27/2012 Data Release Frequency: Quarterly

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 02/27/2012 Date Data Arrived at EDR: 04/04/2012 Date Made Active in Reports: 05/15/2012

Number of Days to Update: 41

Source: EPA

Telephone: 202-564-6023 Last EDR Contact: 07/02/2012

Next Scheduled EDR Contact: 10/15/2012 Data Release Frequency: Quarterly

2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 11/11/2011 Date Data Arrived at EDR: 05/18/2012 Date Made Active in Reports: 05/25/2012

Number of Days to Update: 7

Source: Environmental Protection Agency

Telephone: 703-308-4044 Last EDR Contact: 05/18/2012

Next Scheduled EDR Contact: 08/27/2012 Data Release Frequency: Varies

COAL ASH DOE: Sleam-Electric Plan Operation Data

A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 08/07/2009 Date Made Active in Reports: 10/22/2009

Number of Days to Update: 76

Source: Department of Energy Telephone: 202-586-8719 Last EDR Contact: 07/16/2012

Next Scheduled EDR Contact: 10/29/2012 Data Release Frequency: Varies

FEDLAND: Federal and Indian Lands

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 02/06/2006
Date Made Active in Reports: 01/11/2007

Number of Days to Update: 339

Source: U.S. Geological Survey Telephone: 888-275-8747 Last EDR Contact: 07/19/2012

Next Scheduled EDR Contact: 10/29/2012

Data Release Frequency: N/A

EDR PROPRIETARY RECORDS

EDR Proprietary Records

Manufactured Gas Plants: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A Date Data Arrived at EDR: N/A Date Made Active in Reports: N/A Number of Days to Update: N/A Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A

Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 05/01/2012 Date Data Arrived at EDR: 05/09/2012 Date Made Active in Reports: 06/14/2012

Number of Days to Update: 36

Source: Department of Environmental Conservation

Telephone: 518-402-8651 Last EDR Contact: 05/09/2012

Next Scheduled EDR Contact: 08/20/2012 Data Release Frequency: Annually

WI MANIFEST: Manifest Information
Hazardous waste manifest information.

Date of Government Version: 12/31/2010 Date Data Arrived at EDR: 08/19/2011 Date Made Active in Reports: 09/15/2011

Number of Days to Update: 27

Source: Department of Natural Resources

Telephone: N/A

Last EDR Contact: 07/16/2012

Next Scheduled EDR Contact: 10/01/2012 Data Release Frequency: Annually

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data Source: Rextag Strategies Corp. Telephone: (281) 769-2247

U.S. Electric Transmission and Power Plants Systems Digital GIS Data

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.

Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services

Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services,

a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health

Telephone: 301-594-6248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary

and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

comparable across all states.

Private Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Licensed Child Day Care Providers

Source: Office of Child Development

Telephone: 505-827-7946

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 and 2005 from the U.S. Fish and Wildlife Service.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

STREET AND ADDRESS INFORMATION

© 2010 Tele Atlas North America, Inc. All rights reserved. This material is proprietary and the subject of copyright protection and other intellectual property rights owned by or licensed to Tele Atlas North America, Inc. The use of this material is subject to the terms of a license agreement. You will be held liable for any unauthorized copying or disclosure of this material.

GEOCHECK®-PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

NFPI AND RED LAKE REC. CENTER NAVAJO ROUTE 12 / CLEVELAND BLVD NAVAJO, NM 87328

TARGET PROPERTY COORDINATES

Latitude (North): 35.9084 - 35° 54′ 30.24″ Longitude (West): 109.0321 - 109° 1′ 55.56″

Universal Tranverse Mercator: Zone 12 UTM X (Meters): 677582.2 UTM Y (Meters): 3975377.5

Elevation: 7098 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map: 35109-H1 BUELL PARK, AZ NM

Most Recent Revision: 1982

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

- 1. Groundwater flow direction, and
- 2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

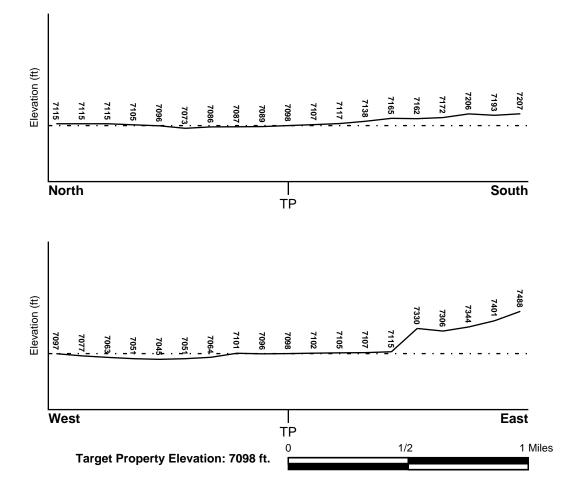
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General NNW

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

FEMA Flood

Target Property County MCKINLEY, NM

Electronic Data
YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property:

35031C - FEMA DFIRM Flood data

Additional Panels in search area:

04001C - FEMA DFIRM Flood data

NATIONAL WETLAND INVENTORY

NWI Electronic

NWI Quad at Target Property

Data Coverage

NOT AVAILABLE

YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Site-Specific Hydrogeological Data*:

Search Radius: 1.25 miles Status: Not found

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

 LOCATION
 GENERAL DIRECTION

 MAP ID
 FROM TP
 GROUNDWATER FLOW

 Not Reported
 The state of the

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

GEOLOGIC AGE IDENTIFICATION

Era: Mesozoic Category: Stratified Sequence

System: Jurassic Series: Jurassic

Code: J (decoded above as Era, System & Series)

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name: AUGUSTINE

Soil Surface Texture: fine sandy loam

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep,

moderately well and well drained soils with moderately coarse

textures.

Soil Drainage Class: Well drained. Soils have intermediate water holding capacity. Depth to

water table is more than 6 feet.

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: HIGH

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

Soil Layer Information							
	Boundary			Classification			
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil	Permeability Rate (in/hr)	Soil Reaction (pH)
1	0 inches	3 inches	fine sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Clayey sand. COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 6.00 Min: 2.00	Max: 7.80 Min: 6.60
2	3 inches	37 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 2.00 Min: 0.60	Max: 7.80 Min: 7.40
3	37 inches	60 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 2.00 Min: 0.60	Max: 8.40 Min: 7.90

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures: loamy fine sand

fine sand

Surficial Soil Types: loamy fine sand

fine sand

Shallow Soil Types: fine sand

Deeper Soil Types: loamy fine sand

unweathered bedrock

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE SEARCH DISTANCE (miles)

Federal USGS 1.000

Federal FRDS PWS Nearest PWS within 1 mile

State Database 1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
1	USGS3008776	1/4 - 1/2 Mile ESE
2	USGS3008778	1/4 - 1/2 Mile NNE
3	USGS3008779	1/4 - 1/2 Mile NE
4	USGS3008769	1/2 - 1 Mile WSW

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID WELL ID FROM TP

No PWS System Found

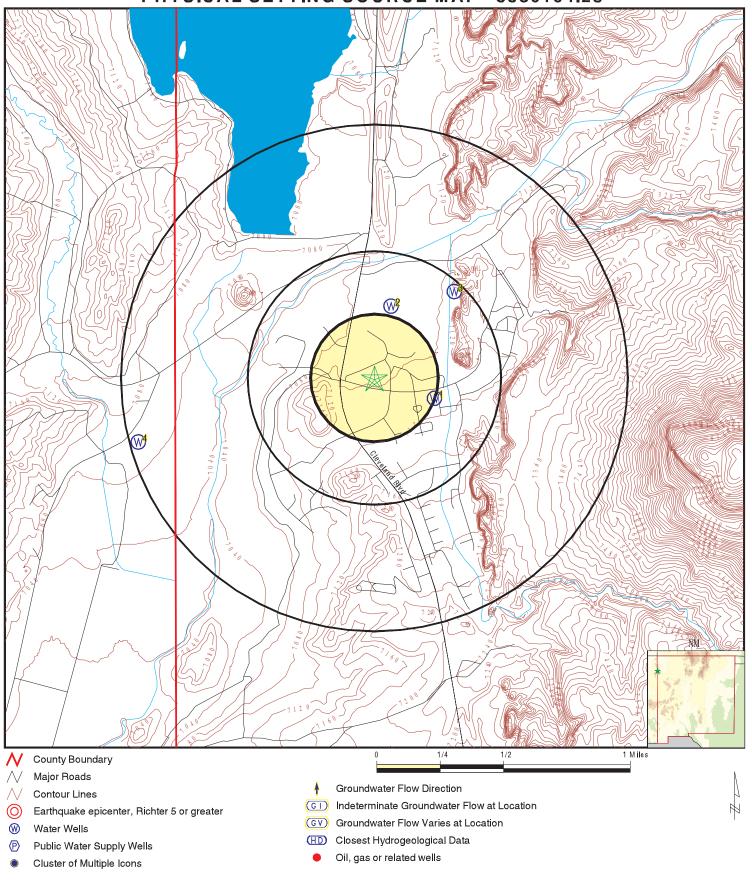
Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID WELL ID FROM TP

No Wells Found

PHYSICAL SETTING SOURCE MAP - 3380164.2s



SITE NAME: NFPI and Red Lake Rec. Center ADDRESS: Navajo Route 12 / Cleveland Blvd

Navajo NM 87328 LAT/LONG: 35.9084 / 109.0321 CLIENT: Daniel B. Stephens Assoc. Inc. CONTACT: Micah Nauck

INQUIRY#: 3380164.2s

DATE: August 02, 2012 5:15 pm

GEOCHECK®-PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance

Elevation Database EDR ID Number

FED USGS USGS3008776 **ESE**

1/4 - 1/2 Mile Higher

Latitude:

Agency cd: **USGS** Site no: 355426109013801

18 089-01.51X06.40 Site name:

USGS3008776 355426 EDR Site id: Longitude: 1090138 Dec lat: 35.90723413 Dec Ion: -109.02787199 Coor meth: Μ Coor accr: Т Latlong datum: NAD27 Dec latlong datum: NAD83 District: 04 031 State: 35 County:

Not Reported Country: US Land net: **BUELL PARK** Location map: Map scale: 62500

7105.00 Altitude:

Altitude method: Interpolated from topographic map

Altitude accuracy:

Altitude datum: National Geodetic Vertical Datum of 1929

Hydrologic: Upper Puerco. Arizona, New Mexico. Area = 1890 sq.mi.

Topographic: Valley flat

Site type: Ground-water other than Spring Date construction: 19681118 Date inventoried: Not Reported Mean greenwich time offset: MST

Local standard time flag:

Type of ground water site: Single well, other than collector or Ranney type

Aquifer Type: Not Reported Aquifer: Not Reported

Well depth: 83.0 Hole depth: 83.0

Source of depth data: Not Reported Project number: **CHN RES**

Daily flow data begin date: 0000-00-00 Real time data flag: 0

Daily flow data end date: 0000-00-00 Daily flow data count:

Peak flow data begin date: 0000-00-00 Peak flow data end date: 0000-00-00 Peak flow data count: Water quality data begin date: 0000-00-00

Water quality data end date:0000-00-00 Water quality data count:

Ground water data begin date: 1968-11-18 Ground water data end date: 1968-11-18

Ground water data count: 1

Ground-water levels, Number of Measurements: 1

Feet below Feet to Date Surface Sealevel

1968-11-18 26.89

NNE **FED USGS** USGS3008778 1/4 - 1/2 Mile

Lower

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

USGS Agency cd: Site no: 355445109014901

Site name: 18 089-01.69X06.04

Latitude: 355445 EDR Site id: USGS3008778 Longitude: 1090149 Dec lat: 35.91251175

Dec Ion: -109.03092766 Coor meth: М Т Latlong datum: NAD27 Coor accr: Dec latlong datum: NAD83 District: 04 County: 031

US Not Reported Country: Land net: Location map: **BUELL PARK** Map scale: 62500

Altitude: 7090.00

Altitude method: Interpolated from topographic map

Altitude accuracy:

Altitude datum: National Geodetic Vertical Datum of 1929

Hydrologic: Upper Puerco. Arizona, New Mexico. Area = 1890 sq.mi.

Topographic: Valley flat

Site type: Ground-water other than Spring Date construction: 19681013 Date inventoried: Not Reported Mean greenwich time offset: MST

Local standard time flag:

Type of ground water site: Single well, other than collector or Ranney type

Aquifer Type: Not Reported

Aquifer: Not Reported

Well depth: 55.0 Hole depth: 55.0

Not Reported Source of depth data: Project number: **CHN RES**

Real time data flag: Daily flow data begin date: 0000-00-00

Daily flow data end date: 0000-00-00 Daily flow data count:

Peak flow data begin date: 0000-00-00 Peak flow data end date: 0000-00-00 Peak flow data count: Water quality data begin date: 0000-00-00

Water quality data end date:0000-00-00 Water quality data count:

Ground water data begin date: 1968-10-13 Ground water data end date: 1968-10-13

Ground water data count:

Ground-water levels, Number of Measurements: 1

Feet below Feet to Surface Sealevel Date

1968-10-13 22.00

Higher

FED USGS USGS3008779 1/4 - 1/2 Mile

Agency cd: **USGS** Site no: 355448109013301

Site name: 18 089-01.46X05.96

USGS3008779 Latitude: 355448 EDR Site id: 35.9133451 Longitude: 1090133 Dec lat: Dec Ion: -109.02648312 Coor meth: Μ Т Latlong datum: NAD27

Coor accr: NAD83 Dec latlong datum: District: 04 State: 35 County: 031

Country: US Land net: Not Reported **BUELL PARK** Location map: Map scale: 62500

Altitude: 7120.00

Altitude method: Interpolated from topographic map

Altitude accuracy:

Altitude datum: National Geodetic Vertical Datum of 1929

Hydrologic: Upper Puerco. Arizona, New Mexico. Area = 1890 sq.mi.

Topographic: Valley flat

Ground-water other than Spring Date construction: 19681114 Site type: Date inventoried: Not Reported Mean greenwich time offset: MST

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

70.0

355417109025301

Local standard time flag:

Type of ground water site: Single well, other than collector or Ranney type

Aquifer Type: Not Reported Not Reported Aquifer:

Well depth: 70.0 Hole depth:

Source of depth data: Not Reported

Project number: **CHN RES**

Real time data flag: Daily flow data begin date: 0000-00-00

Daily flow data end date: 0000-00-00 Daily flow data count:

Peak flow data begin date: 0000-00-00 Peak flow data end date: 0000-00-00 Peak flow data count: Water quality data begin date: 0000-00-00

Water quality data end date:0000-00-00 Water quality data count:

Ground water data begin date: 1968-11-14 Ground water data end date: 1968-11-14

Ground water data count: 1

Ground-water levels, Number of Measurements: 1

Feet below Feet to Date Surface Sealevel

1968-11-14 18.00

FED USGS USGS3008769

WSW 1/2 - 1 Mile Lower

Site no:

Agency cd: USGS 18 089-02.72X06.58 Site name:

Latitude: 355417 EDR Site id: USGS3008769 Lonaitude: 1090253 Dec lat: 35.90473405 -109.04870582 Coor meth: Dec Ion: Μ

Coor accr: Т Latlong datum: NAD27 NAD83 Dec latlong datum: 04 District: 04 001 State: County: Country: US Land net: Not Reported

Location map: **BUELL PARK** Map scale: 62500

Altitude: 7070.00

Altitude method: Interpolated from topographic map

Altitude accuracy:

Altitude datum: National Geodetic Vertical Datum of 1929

Hydrologic: Upper Puerco. Arizona, New Mexico. Area = 1890 sq.mi.

Topographic: Valley flat

Site type: 19610420 Ground-water other than Spring Date construction: Date inventoried: Not Reported Mean greenwich time offset: MST

Local standard time flag:

Type of ground water site: Single well, other than collector or Ranney type

Aquifer Type: Not Reported

Aquifer: Not Reported

Well depth: 107 Hole depth: 107

Source of depth data: Not Reported

CHN RES Project number:

Real time data flag: n Daily flow data begin date: 0000-00-00

Daily flow data end date: 0000-00-00 Daily flow data count:

Peak flow data begin date: 0000-00-00 0000-00-00 Peak flow data end date: Peak flow data count: Water quality data begin date: 1961-04-26

Water quality data end date:1961-04-26 Water quality data count:

Ground water data begin date: 1961-04-24 Ground water data end date: 1961-04-24

Ground water data count: 1

GEOCHECK®-PHYSICAL SETTING SOURCE MAP FINDINGS

Ground-water levels, Number of Measurements: 1

Feet below Feet to Date Surface Sealevel

1961-04-24 35.50

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for MCKINLEY County: 2

Note: Zone 1 indoor average level > 4 pCi/L.

: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.

: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 87328

Number of sites tested: 15

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1.567 pCi/L	93%	7%	0%
Living Area - 2nd Floor Basement	Not Reported Not Reported	Not Reported Not Reported	Not Reported Not Reported	Not Reported Not Reported

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 and 2005 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map. USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Services, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Water Well Database

Source: Office of the State Engineer

Telephone: 505-827-6175

OTHER STATE DATABASE INFORMATION

Oil and Gas Well Locations

Source: New Mexico Institute of Mining and Technology

Telephone: 505-835-5142

RADON

State Database: NM Radon

Source: Environment Department Telephone: 505-827-1093 Radon Test Results

Area Radon Information Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency

(USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at

private sources such as universities and research institutions.

EPA Radon Zones Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor

radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

© 2010 Tele Atlas North America, Inc. All rights reserved. This material is proprietary and the subject of copyright protection and other intellectual property rights owned by or licensed to Tele Atlas North America, Inc. The use of this material is subject to the terms of a license agreement. You will be held liable for any unauthorized copying or disclosure of this material.

NFPI and Red Lake Rec. Center

Navajo Route 12 / Cleveland Blvd Navajo, NM 87328

Inquiry Number: 3380164.3

August 02, 2012

Certified Sanborn® Map Report



Certified Sanborn® Map Report

8/02/12

Site Name: Client Name:

NFPI and Red Lake Rec. Navajo Route 12 / Cleveland Navajo, NM 87328 Daniel B. Stephens Assoc. Inc. 6020 Academy NE Albuquerque, NM 87109

EDR Inquiry # 3380164.3 Contact: Micah Nauck



The complete Sanborn Library collection has been searched by EDR, and fire insurance maps covering the target property location provided by Daniel B. Stephens Assoc. Inc. were identified for the years listed below. The certified Sanborn Library search results in this report can be authenticated by visiting www.edrnet.com/sanborn and entering the certification number. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by Sanborn Library LLC, the copyright holder for the collection.

Certified Sanborn Results:

Site Name: NFPI and Red Lake Rec. Center Address: Navajo Route 12 / Cleveland Blvd

City, State, Zip: Navajo, NM 87328

Cross Street:

P.O. # ES10.0079.09

Project: NFPI and Red Lake Rec. Center

Certification # A713-4F1B-8EF9



Sanborn® Library search results Certification # A713-4F1B-8EF9

UNMAPPED PROPERTY

This report certifies that the complete holdings of the Sanborn Library, LLC collection have been searched based on client supplied target property information, and fire insurance maps covering the target property were not found.

The Sanborn Library includes more than 1.2 million Sanborn fire insurance maps, which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

Library of Congress

✓ University Publications of America

▼ EDR Private Collection

The Sanborn Library LLC Since 1866™

Limited Permission To Make Copies

Daniel B. Stephens Assoc. Inc. (the client) is permitted to make up to THREE photocopies of this Sanborn Map transmittal and each fire insurance map accompanying this report solely for the limited use of its customer. No one other than the client is authorized to make copies. Upon request made directly to an EDR Account Executive, the client may be permitted to make a limited number of additional photocopies. This permission is conditioned upon compliance by the client, its customer and their agents with EDR's copyright policy; a copy of which is available upon request.

Disclaimer - Copyright and Trademark notice

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

Copyright 2012 by Environmental Data Resources, Inc. All rights reserved. Reproduction in any media or format, in whole or in part, of any report or map of Environmental Data Resources, Inc., or its affiliates, is prohibited without prior written permission.

EDR and its logos (including Sanborn and Sanborn Map) are trademarks of Environmental Data Resources, Inc. or its affiliates. All other trademarks used herein are the property of their respective owners.

NFPI and Red Lake Rec. Center

Navajo Route 12 / Cleveland Blvd Navajo, NM 87328

Inquiry Number: 3380164.4

August 07, 2012

The EDR-City Directory Image Report



EDR CITY DIRECTORY REPORT

Environmental Data Resources, Inc.'s (EDR) City Directory Report is a screening tool designed to assistenvironmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Report includes a search of available city directory data at 5 year intervals.

NO COVERAGE

Thank you for your business.

Please contact EDR at 1-800-352-0050 with any questions or comments.

Disclaimer - Copyright and Trademark Notice

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OR DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction orforecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

Copyright 2012 by Environmental Data Resources, Inc. All rights reserved. Reproduction in any media or format, in whole or in part, of any report or map of Environmental Data Resources, Inc. or its affiliates is prohibited without prior written permission.

EDR and its logos (including Sanborn and Sanborn Map) are trademarks of Environmental Data Resources, Inc. or its affiliates. All other trademarks used herein are the property of their respective owners.

Appendix C
Photographs





1. Interior of Particle Board Building #20



2. Machine sump in Particle Board Building #20



3. Pressurized "Halon" canisters in Particle Board Building #20



4. View to the east of aboveground storage tanks (ASTs) near Particle Board Building #20





5. Drainage system access near Particle Board Building #20



6. View to the east of manhole drainage system access near Particle Board Building #20



7. View to west of severe fire damage to a portion of Particle Board Building #20



8. Unknown waste material near Particle Board Building #20 discharging oily, discolored water





9. View to southwest showing the location of the former Sawmill Building #10 in the foreground, with existing structures of Buildings #8, #26 and #20 in the background



10. Transformer located on concrete pad at former sawmill location





11. Concrete trench filled with debris, former Sawmill Building #10



12. Floor drain with discolored water, Powerhouse Building #14

NFPI PHASE I ESA

Photographs

Daniel B. Stephens & Associates, Inc.

Page 6





13. Burned interior of Powerhouse Building #14



14. Corroded concrete pillars in Powerhouse Building #14





15. Fibrous sheeting between inner and outer walls, Powerhouse Building #14



16. Bagged asbestos-containing materials (ACMs) on ground floor of Powerhouse Building #14



17. Corrosive liquid container on ground floor of Powerhouse Building #14.



18. View to the northwest of AST excavation site; concrete structures are tank bases.





19. View to the southwest of fueling pumps and barrels of unknown waste material, with NGTI tank farm in background



20. Barrels and drums containing viscous black liquid, Warehouse Building #13



21. Vehicle maintenance pits in Warehouse Building #13 containing discolored water and debris



22. View to the southwest showing former location of the Millworks Buildings #5 and #15





23. View to the east showing the Thayer Scale Building #27



24. Tank of unknown liquid in Thayer Scale Building #27



25. View to the northeast of Powerhouse Building #14



26. "Used oil" AST and impacted soil on the west side of Building #22





27. View to the northwest of Building #21 and NGTI propane tank farm



28. View to the east of Building #22 with Frog Rock in the background





29. AST on the east side of Building #22 containing an unknown substance; note concrete staining.



30. Unclassified solid waste deposition in the boneyard area north of Building #22.





31. View to the north of the boneyard (former NFPI drum yard)



32. View to the south of the former transformer yard between Buildings #3 and #33



Appendix D Interviews



ISA Interview Summary

Site:	NFPI	
Address:		
Interviewee:	Chandra Manendhar	<u></u>
Affiliation:	Nowais BAA Suprano	
Position:	Sr. Brownian Engree	······································
Phone number:	929 871 7326	
Years in position:	Z y 17.	
Interview date:	Strain	
1		
	ow the past uses of the property? ow of specific chemicals that are / were present at the pr	ronerty?
	ow of spills / chemical releases that have taken place at t	
	ow of any environmental cleanups that have taken place	
Interview Summary:		
Air Souply	Equip - left in strange huild	in #B. Armenting
due in	June 20-27 2017 follow	shy fina @ request of Wars.
Did Pa	ED survey around site so	me week-passibly provide
Mar up 9/26/12	this sike for brounders from at ar survey was done by I alding was not threes at PID survey was done by	Artrox
->clanfred the	of an survey was done by 1	WEPA/ Equipment
left m bu	Iding was next threes	ν .
-> clerified the	it PID survey was done by	Ala. Sa
	wes were sy	reaces Superfune



ISA Interview Summary

Site:	NPPS
Address:	
Interviewee:	Frak Jishie
Affiliation:	Naurio DED
Position:	Industrial Auxionut Specalist
Phone number:	928-871-6286,
Years in position:	13 Nrs.
Interview date:	8/73/12

ASTM Guidance¹: a) Do you know the past uses of the property?

- b) Do you know of specific chemicals that are / were present at the property?
- c) Do you know of spills / chemical releases that have taken place at the property?
- d) Do you know of any environmental cleanups that have taken place at the property?

Interview Summary:

Frank provided access and tour of site. Indicated that several More building hand burned since last phase I Dinter out AST location, exclusion. Did not know purpose of well or purphouse? It other gade and building the site. Indicated that well #29 was beind building #20, an was accessible. No records of these wells, depth, screen, etc.



ISA Interview Summary

Site:	NEPT
Address:	
Interviewee:	Richard Bitsie
Affiliation:	Red Lake Chapter
Position:	Vice Pres.
Phone number:	
Years in position:	
Interview date:	8/23/12

ASTM Guidance¹: a) Do you know the past uses of the property?

- b) Do you know of specific chemicals that are / were present at the property?
- c) Do you know of spills / chemical releases that have taken place at the property?
- d) Do you know of any environmental cleanups that have taken place at the property?

Interview Summary:

worked at NFPI starting 1968. New Red Lake chapter Vice pres. Stated that a company from Farmington was supposed to clean out power house, but left after only bagging some ACBM and remaining some smell amoters. Hever disposed of ACBM, still an site.



ISA Interview Summary

Site:	NFPI
Address:	
Interviewee:	Horn Havea
Affiliation:	MAJEPA - LUST Program
Position:	Geelosist
Phone number:	128 - 871 -7997
Years in position:	5+
Interview date:	8/24/12

ASTM Guidance¹: a) Do you know the past uses of the property?

- b) Do you know of specific chemicals that are / were present at the property?
- c) Do you know of spills / chemical releases that have taken place at the property?
- d) Do you know of any environmental cleanups that have taken place at the property?

Interview Summary:

Mr. Havell was responsible for removing the AST tents and Soil. He stated that when he arrived to Pull the tents, they were already gene. Soils were "saturated" with full product. Soil scaples indicated diesel finel -> (as that not available, given to RBDO office. Samples were low @fueling stends. Mr. Haven also indirected that upcommy work would entail removal of the Asts @ building #22, contamply soil, and sampling of wells 26,27,28, and abandorment of the wells.

Mr. Haven verified the Cocation of the Thriffway #238, but stated it was abandoned before he joined NNEPA. He wasn't sire if there were any records related to the site, or the canoco station.

Appendix E

Statement of **Qualifications**

EDUCATION

B.A., Geology, 1993 University of New Mexico

B.A., Psychology, 1988 University of New Mexico

REGISTRATIONS

Professional Geologist No. 3051, Wyoming

New Mexico Construction Industries Division GS-29- Soil Remediation No. 943006

AFFILIATIONS

National Groundwater Association

New Mexico Geological Society

Mr. Bunch specializes in providing geologic, hydrogeologic, and regulatory compliance services to clients in New Mexico, Arizona and Texas. He manages a variety of operations, including monitoring and maintaining project budgets and schedules; oversight of staff scientists, engineers, field technicians, and subcontractors; communication of project objectives with clients and/or regulatory agencies; design and implementation of field programs and corrective action plans; preparation of reports and proposals; and development of new business and clientele. Mr. Bunch is proficient at assembling geologic and hydrogeologic data into concise, comprehensive and interpretive reports which clearly address all objectives of the project. The resulting recommendations aid both the client and the regulatory agency. He prepares a variety of technical reports for the following type of projects: hydrogeologic investigations, Phase 1 and II environmental investigations, preliminary and detailed site investigations, corrective action/remedial design plans and reclamation proposals.

Site Assessments and Remediation of Petroleum Contamination/Hazardous Materials, New Mexico Oil Conservation Division, Multiple Sites, New Mexico: Performed numerous Phase I and Phase II investigations and remedial action at various abandoned oil and gas processing and production sites throughout the state of New Mexico. The assessments and remediation have included the following: investigation and cleanup of large waste pits and oil sludge lagoons, hydrogeologic investigations including soil borings and monitoring well installations, cleanup and disposal of large aboveground storage tanks, asbestos investigation and abatement, contaminated soil delineation and removal, NORM surveys, water quality analysis, mobile mapping and GIS, construction management, and report preparation. These sites include the RUNCO Acidizing and Fracturing Plant in Jal, the JAMAR Oil Processing Plant in Monument, the Ammonite Site, and the Meteor Sites.

Site Assessments and Remediation of Petroleum Contamination/Hazardous Materials, New Mexico Department of Transportation (NMDOT), Multiple Sites, New Mexico: Performed numerous Phase I and Phase II investigations and remedial action at various NMDOT patrol yards throughout the state of New Mexico. The assessments and remediation have included the following: hydrogeologic investigations including soil borings and monitoring well installations, contaminated soil delineation and removal, remedial action system analysis and feasibility studies, conceptual remedial action design and pilot studies, water quality analysis, mobile mapping and GIS, construction management, and report preparation.

Brownfield Redevelopment - Former Phil Carrell Chevrolet Dealership, Carlsbad, New Mexico: This project started with a Phase I and II ESA involving a large commercial property made up of four separately leased tracts of land.

John Bunch, P.G.

Page 2

The Phase II revealed extensive soil and groundwater contamination from leaking underground storage tanks. It was revealed during this investigation that hydrocarbons impacting the soil and groundwater were present beneath the former UST location and the building. Approximately 1,000 cubic yards of soil was removed. Mr. Bunch submitted a remedial action plan to the New Mexico Environment Department (NMED)/Ground Water Quality Bureau (GWQB) and NMED Petroleum Storage Tank Bureau (PSTB) in order to address the soil and groundwater contamination at the site. The plan was approved and a dual-phase pump-and-treat/soil vapor extraction (SVE) system was installed and operated at the site. The client entered the VRP program to expedite cleanup and redevelopment at the site.

Site Assessments and Remediation of Petroleum Contamination, Allsups Petroleum Inc., Multiple Sites, New Mexico: Over the course of Mr. Bunch's professional relationship with Allsups Petroleum, he managed more than 40 gasoline-contaminated sites that were being regulated by the NMED PSTB. Work performed included preliminary and hydrogeologic investigations, monitor well installations, free-product removal, soil excavation, monitored natural attenuation, groundwater modeling, GPS mobile mapping, engineered remediation systems, field analysis, PSTB documentation, report preparation, permit preparation, and coordination with the client and PSTB to ensure cost-effective cleanup and site closure.

Phase II investigation, Bernalillo County Public Works, Carlito Springs, Tijeras, New Mexico: Completed Phase II environmental site assessment for a 198-acre site located near Tijeras, Bernalillo County, New Mexico. Mr. Bunch implemented a Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan) which was approved by the Environmental Protection Agency (EPA) Region 6. The scope of services included the following: inspection of the subject property, advancement of soil borings to determine the extent of volatile and semivolatile organics, lead, polychlorinated biphenyls (PCBs), asbestos, and petroleum hydrocarbons, completion of a groundwater monitoring well to assess groundwater impact at the subject property.

Phase I ESAs, Sandia Pueblo, Albuquerque, New Mexico: Mr. Bunch completed multiple Phase I ESAs, in conformance with ASTM Standard E1527-00, with asbestos and lead-based paint investigations for properties being redeveloped by the Sandia Pueblo. The environmental assessments were conducted in accordance with the standards set by the ASTM for the conduct of Phase I Environmental Assessments, ASTM E-1527-00. Many of the surveys took place on archeologically and culturally sensitive tracts of land.

EDUCATION

M.S., Geology, 2004, Northern Arizona University

B.S., Geology, 1999, Northern Arizona University

REGISTRATIONS

Professional Geologist, California, No. 8543

Registered Geologist, Arizona, No. 50377

RECENT PRESENTATIONS AND PUBLICATIONS

Raucci, J.J., R.C. Blakey, and P.J. Umhoefer. 2006. A new geologic map of Petrified Forest National Park, with emphasis on members and key beds of the Chinle Formation. pp. 157-159 *in* Parker, W., S. Ash, and R. Irmis (eds.), *A century of research at Petrified Forest National Park: Geology and paleontology*. Museum of Northern Arizona Bulletin 62.

Raucci, J.J., R.C. Blakey, and P.J. Umhoefer. 2006. New geologic mapping of Petrified Forest National Park aids in understanding evolution of land animals in Arizona. *Arizona Geology* 36(2):1-4.

Amoroso, L. and J.J. Raucci. 2005. Paleoseismology and geomorphology of the Hurricane fault/escarpment. pp. 449-477 *in* Pederson, J.L. and C.M. Dehler (eds.), *GSA Field Guide 6: Interior Western United States*.

Mr. Raucci has six years of professional experience providing environmental consulting services to land developer, mining, industrial, academic, and state clients. He specializes in groundwater hydrology, environmental site characterization, aquifer testing and analysis, stratigraphy, structural geology, and GIS. Mr. Raucci's project experience includes work in California, Arizona, and New Mexico.

RCRA Post Closure Permit, Monitoring Program Implementation, Santa Susanna Field Laboratory, Chatsworth, California: Organized and implemented a major revision for a groundwater monitoring program to comply with new RCRA post-closure permit conditions at a large, complex, historic industrial site. Drafted a new water quality sampling and analysis plan covering 9 RCRA regulated units and including more than 100 monitor wells. Designed and installed new monitoring wells and retrofitted existing wells for low-flow sampling. Conducted field oversight, supervised field staff, planned project schedules and budgets, managed subcontractors, and reported to client regarding project status.

Technical Support for Adjudicated Appeal of RCRA Permit Conditions, Confidential Client, Southern California: Provided technical research and writing support for a legal team during an adjudicated appeal of specific conditions of a RCRA permit. Supplied written rationale and supporting data for appeal arguments and written responses to statements submitted by regulators and the general public.

Vadose Zone and Groundwater Characterization of Chlorinated Solvent Contamination, Skyworks Solutions, Inc., Thousand Oaks, California: Planned and implemented a comprehensive site-wide investigation of groundwater and vadose zone chlorinated solvent contamination, including soil, soil vapor, and interval-specific groundwater sampling and installation of deep groundwater test holes. Responsibilities included conducting an investigation design to meet conditions of local regulatory agency, budgeting, subcontractor coordination, and oversight of field activities and supporting field staff.

Hydrogeologic Site Characterization, Twin Buttes Properties Inc., Sahuarita, Arizona: Performed a comprehensive hydrogeologic characterization of a former mine site being considered for CERCLA designation. Investigation included compilation and analysis of available geologic, hydrologic, and environmental data, including borehole logs, geologic mapping, aquifer tests, monitoring data, groundwater and surface water chemical analyses, and other historical site information. Included design and installation of new monitor wells in support of characterization and analysis of contaminant sources, transport, and fate.

Jason J. Raucci, R.G. Page 2

RECENT PRESENTATIONS AND PUBLICATIONS (continued)

Raucci, J.J., P.J. Umhoefer, and S.A. Kelley. 2005. Critiquing the interpretation of the Hurricane fault as a reactivated Laramide monocline. *Geological Society of America Abstracts with Programs* 37(7):204.

Raucci, J.J., M.H. Ort, R.C. Blakey, P.J. Umhoefer, N.O. Blythe, and M.H. Manone. 2003. National Park Service geologic resource evaluation: geologic mapping of Walnut Canyon National Monument and Petrified Forest National Park, northern Arizona. Geological Society of America Abstracts with Programs 36(5):230.

Raucci, J.J., N.O. Blythe, M. Manone, M.H. Ort, and P.J. Umhoefer. 2003. *Geologic map of Walnut Canyon National Monument and vicinity*. Online publication for NPS Geologic Resource Inventory. Available at http://science.nature.nps.gov/nrdata/>.

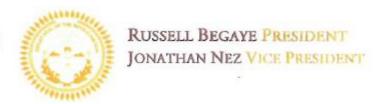
Moan, B.L., J.J. Raucci, and P.J. Umhoefer. 2003. Structural style and magnitude of extension at the southwest corner of the Colorado Plateau in northwestern Arizona. *Geological Society of America Abstracts with Programs* 35(5):37.

Geologic Mapping of Petrified Forest National Park and Walnut Canyon National Monument, Arizona: Applied for and received National Park Service grant funding to conduct geologic mapping at national parks and monuments in Arizona. Conducted field investigations using conventional and digital mapping tools, constructed cross-sections, evaluated geologic hazards to park resources or infrastructure, produced technical reports and presentations describing findings, and produced digital maps and FGDC-compliant data sets.

Assured and Adequate Water Supply Determinations, Various Clients, Arizona: Compiled and analyzed existing hydrogeologic data, regional water demand data, and performed basic analytical groundwater modeling to determine the potential availability, as defined by the Department of Water Resources, of a given quantity of groundwater at a particular location. Conducted AWS investigations and analyses in a number of geologic settings for various clients.

Appendix B: Support	letter from the Nava	jo Nation Division o	of Economic Developn	nent

THE NAVAJO NATION



December 19, 2016

Noemi Emeric-Ford EPA Region 9 75 Hawthorne Street, SFD6-1 San Francisco, CA 94105

RE: Support Letter for Fiscal Year 2017 Navajo Nation EPA Superfund Brownfields Assessment Grant for the Navajo Forest Products Industries Site, Navajo, McKinley County, New Mexico.

Dear Noemi Emeric-Ford:

On behalf of the Navajo Nation Department of Economic Development (NNDED), I am pleased to commit our support and efforts towards the Navajo Nation EPA Superfund Program (NSP) Brownfields Assessment Grant program for which the NSP are applying to the USEPA. This environmental assessment is very much needed for the Navajo Forest Products Industry (NFPI) site on the Navajo Nation.

The USEPA funding for the NSP will be extremely helpful in addressing environmental concerns at this site in Navajo, New Mexico. We look forward to assisting the NSP office and the community of the Red Lake Chapter#18 (RLC) in addressing this abandoned site. Furthermore, our agency looks forward in working together to better our Navajo communities.

The NNDED is engaged in the cleanup of the NFPI site. We have already taken down all the structures that have been dilapidated and only the Kiln building remains. This building is littered with asbestos containing materials throughout the structures. More funding and cleanup is required to complete this activity. The soils and groundwater will need to be addressed before we can start placing new facilities on the site as well as the cleanup of all the saw dust deposited by the NFPI operations which is off site. The NNDED has no jurisdiction off the site and we will need assistance on this issue from the NSP.

The site is currently under planning studies for possible developments in the areas of Biomass applications for fuel and wood pellets, recreational activities, manufacturing as well as a tire recycling facility. The community is behind the cleanup and it is progressing well. The community also supports the recreation aspect of this future development and we have completed a schematic design for the lands just west of the existing NFPI site for parks, baseball fields and swimming pool.

The site is located on our Federal Scenic Byways listing. We need to complete the cleanup for this region because the region is just beautiful in vistas and natural wonders. It is our intention to get this site ready and we have an uphill battle to get funding for this region as we have been turned down before. Now we have engaged the U.S. Senators office of Tom Udall, New Mexico (NM) for assistance in the Brownsfields application.

The site resides in this community of Navajo, NM and when the old plant was shut down the community just about died. The plant was the only income generating potential in the region and everything spun off this factory. We need to get this community back up and flourishing again. This effort to cleanup what has been left behind is critical to the revitalization of the region and community.

The loss of income to the Navajo Nation from the taxes generated by the previous plant is tremendous and the community has suffered along since the 1980's. Now that the old buildings have been removed. The community therefore now has hope again to rise like a Phoenix to improve the quality of life for our Navajo citizens in Navajo, NM.

Moreover, the NNDED will serve as a partner and as such will commit to support the NSP office by:

- Identifying sites targeted for redevelopment in Navajo Nation
- Helping to market these services to Navajo Chapter communities and other Navajo Nation Government Departments and Divisions and
- · Staff review of environmental assessments

The NNDED urges favorable consideration of the NSP application.

Sincerely,

Crystal J. Deschinny, Director Division of Economic Development

Navajo Nation

Appendix C: Support letter from the Red Lake Chapter#18 Community



THE NAVAJO NATION

RUSSELL BEGAYE PRESIDENT
JONATHAN NEZ VICE PRESIDENT

Red Lake Chapter

P.O. Box 130 Navajo, NM 87328

December 19, 2016

Noemi Emeric-Ford EPA Region 9 75 Hawthorne Street, SFD6-1 San Francisco, CA 94105

RE: Support Letter for Fiscal Year 2017 Brownfields Assessment Grant for the Navajo Forest Products Industries Site, Navajo, McKinley County, New Mexico.

Dear Noemic Emeric-Ford:

The Red Lake Chapter#18 is in support of the Navajo Nation Environmental Protection Agency Superfund Program's (NSP) proposal for the Brownfields Assessment Grant which will allow the Navajo Forest Products Industries (NFPI) site and its dumpsite to be assessed with funding provided by the grant.

The RLC has worked with the NSP and the Navajo Nation Division of Economic Development to request action and resources to assess and cleanup the NFPI site for redevelopment. Before any type of redevelopment can occur at this site, the entire site needs to be assessed for contamination and have that contamination cleaned up. The RLC does not have funds for assessment or cleanup activities. There are plans for reuse of the site. The cleanup itself can provide much needed jobs for our depressed community.

The RLC has worked in partnership with the NSP and other Navajo Government offices to address problems stemming from the NFPI contamination. In the summer of 2010, we worked effectively together to address a fire at the dumpsites which causes health problems for our nearby residents (some who live only 400 feet from the dump). The fire self ignites and is most likely fueled by disposal waste, some of which could be hazardous substances from the NFPI site. It continues to be hazard due to spontaneous combustion.

The RLC is a Local Government of the Navajo Nation, who approves and supports the proposal to assess, and most importantly, for the community to utilize the former NFPI site and dumpsite for redevelopment or green space. Our mission is focused to remediate and redevelopment the NFPI site for the purpose of stimulating our small economy in a community that has high poverty, high unemployment, and abandoned buildings. We have hope for a thriving community. This grant could help provide some of that much needed revitalization.

Sincerely,

Arval T. McCabe, Chapter President

Red Lake Chapter#18

OMB Number: 4040-0004 Expiration Date: 10/31/2019

Application for	r Federal Assista	ınce SF	-424				
* 1. Type of Submis Preapplication Application Changed/Cor		⊠ Ne	e of Application: ew ontinuation evision		Revision, select appropriate ther (Specify):	oriate letter(s):	
* 3. Date Received:	:	4. Appli	cant Identifier:				
5a. Federal Entity Id	dentifier:			,	5b. Federal Award Ide	entifier:	
State Use Only:				15			
6. Date Received by	y State:		7. State Application	Ide	entifier:		
8. APPLICANT IN	FORMATION:						
* a. Legal Name:	The Navajo Nati	.on					
* b. Employer/Taxpa 86-0092335	ayer Identification Nur	mber (EIN	I/TIN):	Iг	* c. Organizational DU	INS:	
d. Address:							
* Street1: Street2:	P.O. Box 646]
* City:	Window Rock						
County/Parish:	Apache						
* State: Province:					AZ: Arizor	na	
* Country:					USA: UNITED S	TATES	
* Zip / Postal Code:	86515-0646					•	
e. Organizational	Unit:						
Department Name:				T	Division Name:		
WRCD -Superfu	nd Program				Navajo Nation E	CPA	
f. Name and conta	act information of p	erson to	be contacted on m	atte	ers involving this ap	pplication:	
Prefix:			* First Nam	e:	Cordell		
Middle Name:							_
l <u> </u>	ortey						
Suffix:							
Title: Contracti	ing Officer, NN	OMB -	CGS				
Organizational Affili	ation:						
Navajo Nation Office of Management & Budget							
* Telephone Number: (928)871-6470 Fax Number: (928)871-6567							
* Email: cshorte	ey@omb.navajo-n	sn.gov					

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
I: Indian/Native American Tribal Government (Federally Recognized)
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Environmental Protection Agency
11. Catalog of Federal Domestic Assistance Number:
66.818
CFDA Title:
Brownfields Assessment and Cleanup Cooperative Agreements
* 12. Funding Opportunity Number:
EPA-OLEM-OBLR-16-08
* Title:
FY17 Guidelines for Brownfields Assessment Grants
13. Competition Identification Number:
NONE
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
No. 14 Areas Affected by Project Listing of Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
To address both hazardous substances and petroleum contamination for a period of three years at
the former Navajo Forest Products Industries Site, Navajo, McKinley County, New Mexico.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424									
16. Congressiona	Districts Of:								
* a. Applicant	NM-003			* b. Program/Project NM-	003				
Attach an additional	list of Program/Project Co	ongressional Distric	ts if needed.						
			Add Attachment	Delete Attachment \	/iew Attachment				
17. Proposed Pro	ect:								
* a. Start Date: 04	1/01/2017			* b. End Date: 03/	30/2020				
18. Estimated Fur	ding (\$):								
* a. Federal		350,000.00							
* b. Applicant		0.00							
* c. State		0.00							
* d. Local		0.00							
* e. Other		0.00							
* f. Program Incom	e	0.00							
* g. TOTAL		350,000.00							
* 19. Is Applicatio	n Subject to Review By	State Under Exec	cutive Order 12372 Pr	ocess?					
				12372 Process for review or					
_	subject to E.O. 12372 b		elected by the State fo	r review.					
c. Program is	not covered by E.O. 123	372.							
	ant Delinquent On Any	Federal Debt? (If	"Yes," provide expla	nation in attachment.)					
				☐ Yes ☐ No					
If "Yes", provide explanation and attach									
If "Yes", provide e	xplanation and attach		Add Attachment	Doloto Attochment	Sour Attack mont				
			Add Attachment		/iew Attachment				
21. *By signing the herein are true, comply with any resubject me to crim	is application, I certify	to the best of me pt an award. I am	ents contained in the ny knowledge. I also aware that any false,	list of certifications** and (i provide the required assur fictitious, or fraudulent state	2) that the statements ances** and agree to				
21. *By signing therein are true, comply with any r	is application, I certify complete and accurate esulting terms if I acce	to the best of me pt an award. I am	ents contained in the ny knowledge. I also aware that any false,	list of certifications** and (i provide the required assur fictitious, or fraudulent state	2) that the statements ances** and agree to				
21. *By signing the herein are true, comply with any resubject me to crim	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administr cations and assurances,	to the best of m pt an award. I am ative penalties. (U	ents contained in the ny knowledge. I also aware that any false, J.S. Code, Title 218, S	list of certifications** and (i provide the required assur fictitious, or fraudulent state	2) that the statements ances** and agree to ements or claims may				
21. *By signing the herein are true, comply with any resubject me to crim ** I AGREE ** The list of certifity	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrucations and assurances,	to the best of m pt an award. I am ative penalties. (U	ents contained in the ny knowledge. I also aware that any false, J.S. Code, Title 218, S	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing the herein are true, comply with any resubject me to crime ** I AGREE*** The list of certific specific instructions	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrucations and assurances, sentative:	to the best of mot an award. I am ative penalties. (U	ents contained in the ny knowledge. I also aware that any false, J.S. Code, Title 218, S	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing the herein are true, comply with any resubject me to crime ** I AGREE*** The list of certific specific instructions Authorized Representations	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrucations and assurances, sentative:	to the best of mot an award. I am ative penalties. (U	ents contained in the hy knowledge. I also aware that any false, J.S. Code, Title 218, S where you may obtain	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing the herein are true, comply with any resubject me to crime ** I AGREE* ** The list of certific specific instructions Authorized Representation ** Prefix: Mr. Middle Name:	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrucations and assurances, sentative:	to the best of mot an award. I am ative penalties. (U	ents contained in the hy knowledge. I also aware that any false, J.S. Code, Title 218, S where you may obtain	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing the herein are true, comply with any resubject me to crime ** I AGREE* ** The list of certific specific instructions Authorized Representation ** Prefix: Mr. Middle Name:	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrations and assurances, sentative:	to the best of mot an award. I am ative penalties. (U	ents contained in the hy knowledge. I also aware that any false, J.S. Code, Title 218, S where you may obtain	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing therein are true, comply with any resubject me to crime ** I AGREE*** The list of certific specific instructions Authorized Repre Prefix: Mr Middle Name: Beg ** Last Name: Beg Suffix:	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrations and assurances, sentative:	to the best of mot an award. I am ative penalties. (Use or an internet site	ents contained in the hy knowledge. I also aware that any false, J.S. Code, Title 218, S where you may obtain	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing therein are true, comply with any resubject me to crime ** I AGREE* ** The list of certific specific instructions Authorized Representation ** Mr. Middle Name: * Last Name: Suffix: * Title: * Press.	is application, I certify complete and accurate esulting terms if I acceninal, civil, or administrations and assurances, sentative:	to the best of mot an award. I am ative penalties. (Use or an internet site	ents contained in the ny knowledge. I also aware that any false, J.S. Code, Title 218, S where you may obtain at Name: Russell	list of certifications** and (a provide the required assur fictitious, or fraudulent state ection 1001)	2) that the statements ances** and agree to ements or claims may				
21. *By signing therein are true, of comply with any results and the subject me to crime and the subject me to complete and the subject me to crime and the subject me t	is application, I certify complete and accurate esulting terms if I acce ninal, civil, or administrations and assurances, sentative:	to the best of mot an award. I am ative penalties. (Use or an internet site state) * First on	ents contained in the ny knowledge. I also aware that any false, J.S. Code, Title 218, S where you may obtain at Name: Russell	list of certifications** and (provide the required assurfictitious, or fraudulent state ection 1001) this list, is contained in the an	2) that the statements ances** and agree to ements or claims may				